

GRY AHLEFELD-ENGEL 30(b)(6)
Stein v Skatteforvaltningen

May 30, 2024

1-4

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<p>1 2 UNITED STATES DISTRICT COURT 3 SOUTHERN DISTRICT OF NEW YORK 4 - - - - -) 5 MATTHEW STEIN and JEROME LHOTE,) 6 Plaintiffs,) Case No.: 7 v.) 23 Civ. (NRB) 8 SKATTEFORVALTNINGEN,) 9 Defendant.) 10 and) 11 LUKE MCGEE,) 12 Nominal Defendant.) 13 - - - - -) 14 SKATTEFORVALTNINGEN,) 15 Counterclaim Plaintiff,) 16 v.) 17 MATTHEW STEIN, JEROME LHOTE,) 18 and LUKE MCGEE,) 19 Counterclaim Defendants.) 20 - - - - -) 21 VIDEOTAPED 30(b)(6) DEPOSITION OF 22 SKATTEFORVALTNINGEN by GRY AHLEFELD-ENGEL 23 24 Reported by: Kim M. Brantley 25 Job No: J11294056</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6) 2 APPEARANCES: 3 For Plaintiffs/Counterclaim Defendants 4 Matthew Stein and Jerome Lhote: 5 MCKOOL SMITH, PC 6 1301 Avenue of the Americas 32nd FL 7 New York, New York 10019 8 (212) 402-9412 9 Email: dlevy@mckoolsmith.com 10 ovisconti@mckoolsmith.com 11 BY: DANIEL LEVY, ESQUIRE 12 OLIVIA VISCONTI, ESQUIRE 13 14 For Defendant/Counterclaim Plaintiff 15 Skatteforvaltningen: 16 HUGHES HUBBARD & REED, LLP 17 One Battery Park Plaza 18 New York, New York 10004 19 (212) 837-6843 20 Email: marc.weinstein@hugheshubbard.com 21 neil.oxford@hugheshubbard.com 22 kiran.rosenkilde@hugheshubbard.com 23 BY: MARC A. WEINSTEIN, ESQUIRE 24 NEIL J. OXFORD, ESQUIRE 25 KIRAN ROSENKILDE, ESQUIRE</p>
Page 2	Page 4
<p>1 GRY AHLEFELD-ENGEL 30(b)(6) 2 Thursday, May 30, 2024 3 Time: 9:36 a.m. 4 Videotaped 30(b)(6) deposition of 5 SKATTEFORVALTNINGEN, by GRY AHLEFELD-ENGEL, held 6 at Hughes Hubbard & Reed, One Battery Park Plaza, 7 New York, New York, before Kim M. Brantley, Court 8 Reporter and Notary Public of the State of New 9 York. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6) 2 APPEARANCES CONTINUED: 3 For Nominal Defendant/Counterclaim Defendant 4 Luke McGee: 5 NELSON MULLINS RILEY & SCARBOROUGH, LLP 6 2 S Biscayne Blvd. - 21st Floor 7 Miami, Florida 33131 8 (305) 373-9400 9 Email: dan.newman@nelsonmullins.com 10 justin.kaplan@nelsonmullins.com 11 edgar.neely@nelsonmullins.com 12 BY: DANIEL NEWMAN, ESQUIRE 13 JUSTIN B. KAPLAN, ESQUIRE 14 EDGAR A. NEELY, IV, ESQUIRE (Georgia) 15 (Attending via Zoom) 16 ALSO PRESENT: 17 Counsel from Kammeradvokaten (Denmark) 18 KATRINE HENCKEL HARLOFF, ESQUIRE 19 ANNE CHRISTINE K. EGHOLM, ESQUIRE 20 MIKKEL D. FANO, ESQUIRE 21 (Attending via Zoom) 22 and 23 MATTHEW STEIN, Plaintiff 24 JEROME LHOTE, Plaintiff 25 (Attending via Zoom)</p>

Age Group	Percentage of Respondents
18-29	90%
30-49	85%
50-64	80%
65+	60%

[illegible]

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2 [REDACTED]

3 MR. LEVY: Very good. Thank you.

4 And the plaintiffs have no objection to

5 the manner of the taking of the -- of the

6 oath of the interpreter, who's located

7 outside the United States, correct?

8 MR. WEINSTEIN: Well, you're the

9 plaintiffs, but it's correct that we -- we do

10 not.

11 MR. LEVY: I'm -- I'm saying that the

12 plaintiffs have no objection to the taking of

13 the oath of the interpreter.

14 MR. WEINSTEIN: Yeah.

15 MR. LEVY: Who's located outside the

16 United States. I'm saying that for the

17 record on behalf of the plaintiffs.

18 MR. WEINSTEIN: Yes.

19 MR. LEVY: And I'm going to ask you to

20 indicate the same.

21 MR. WEINSTEIN: Yes.

22 MR. LEVY: Okay, very good. Thank you.

23 And you confirm she's not located in the

24 United States?

25 MR. WEINSTEIN: Correct.

Page 11

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 And you're here as a representative --

15 testifying as a -- in your -- in a representative

16 capacity on behalf of an entity, correct?

17 A. Yes.

18 Q. And could you identify the name of the

19 entity that you're testifying on behalf of?

20 A. Skatteforvaltningen.

21 Q. Very good. If -- if I just refer to

22 that as "Skatte," can we agree that that's the

23 correct entity?

24 A. We can agree on that, yes.

25 Q. Okay. Is it commonly known as Skatte?

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. It used to be.

3 Q. Okay. And -- and is it known

4 something -- by something else now?

5 A. Skatteforvaltningen.

6 Q. Okay. People don't refer to -- to it

7 in common parlance as -- as Skatte?

8 A. Well, the -- yes, a Danish person would

9 refer to it as "Skatte".

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. It used to be.

3 Q. Okay. And -- and is it known

4 something -- by something else now?

5 A. Skatteforvaltningen.

6 Q. Okay. People don't refer to -- to it

7 in common parlance as -- as Skatte?

8 A. Well, the -- yes, a Danish person would

9 refer to it as "Skatte".

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Age Group	Percentage of Respondents
18-29	85%
30-49	80%
50-64	75%
65+	65%

Age Group	Percentage of Respondents
18-29	95%
30-49	90%
50-64	85%
65+	85%

[illegible]

[illegible]

[illegible]

[illegible]

[REDACTED]

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

13 Q. And did Skatte have communications with
14 SOIK about the settlement negotiations prior to
15 April 24th, 2019?

16 A. I do believe that we on a regular basis
17 notified SOIK in general that we were having
18 negotiations with a group of people regarding the
19 case that we had previously reported to SOIK.

[REDACTED]

[illegible]

Age Group	Gender	Percentage Vaccinated
18-24	Male	~15%
18-24	Female	~10%
25-34	Male	~25%
25-34	Female	~20%
35-44	Male	~35%
35-44	Female	~30%
45-54	Male	~45%
45-54	Female	~40%
55-64	Male	~55%
55-64	Female	~50%
65-74	Male	~65%
65-74	Female	~60%
75+	Male	~75%
75+	Female	~70%

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>Page 48</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>11 Q. Prior to this time, April 2019 -- April</p> <p>12 25th, 2019 --</p> <p>13 A. Yes.</p> <p>14 Q. -- had SOIK been provided by Skatte</p> <p>15 anything in writing concerning the settlement</p> <p>16 negotiations relative to the ultimate settlement</p> <p>17 agreement?</p> <p>18 A. Not to my knowledge, no.</p> <p>[REDACTED]</p>



Category	Should take action	Should not take action
All respondents	85%	15%
Age		
18-29	88%	12%
30-49	85%	15%
50-69	82%	18%
70+	80%	20%
Gender		
Male	83%	17%
Female	87%	13%
Education		
High school or less	80%	20%
Some college	85%	15%
Bachelor's or higher	88%	12%

<p>[REDACTED]</p>	<p style="text-align: right;">Page 55</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 A. Yes.</p> <p>3 Q. Okay. This is a continuation of the</p> <p>4 same series of emails that we were looking at in</p> <p>5 Exhibit 100.</p> <p>6 (Witness nods head in the affirmative.)</p> <p>7 Q. You have to answer audibly.</p> <p>8 A. Oh, I'm so sorry. Yes.</p> <p>9 Q. That's okay. Thank you.</p> <p>10 And I want to just move up from the end</p> <p>11 of that string and start where Mr. Fiig indicates,</p> <p>12 "Hopner also raised". I'd give you the Bates</p> <p>13 number, but they're not Bates numbered in a way</p> <p>14 that is frankly productive.</p> <p>15 A. Is that the one where he says, "Yes,</p> <p>16 but Hopner had supplementary -- supplemental</p> <p>17 questions," or further up?</p> <p>18 Q. It's the email April 25th, 2019 at</p> <p>19 13:01.</p> <p>20 A. Yes.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>25 Q. Okay, perfect. Great.</p>
<p style="text-align: right;">Page 54</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>16 MR. LEVY: I'm going to ask you to --</p> <p>17 I'm going to ask the reporter to mark this as</p> <p>18 Exhibit 101.</p> <p>19 (Email chain was marked Skatte Exhibit</p> <p>20 101, for identification.)</p> <p>21 (Witness reviews document.)</p> <p>22 BY MR. LEVY:</p> <p>23 Q. Have you had a moment to look at that?</p> <p>24 A. Yes.</p> <p>25 Q. You've seen it before?</p>	<p style="text-align: right;">Page 56</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 So Mr. -- Mr. Fiig indicates in</p> <p>3 substance that Hopner also raised the question,</p> <p>4 "If the ultimate owners, the U.S. shareholders,</p> <p>5 got clarified their overall relationship in</p> <p>6 connection with the settlement. He indicated that</p> <p>7 would also cover the question of their position in</p> <p>8 relation to the criminal case. Have you heard</p> <p>9 anything about that?"</p> <p>10 So do you -- do you understand to whom</p> <p>11 Mr. Fiig was referring when he refers to "the U.S.</p> <p>12 shareholders"?</p> <p>13 A. Yes.</p> <p>14 Q. Who's?</p> <p>15 A. Mr. Stein, Mr. Lhote, and Mr. McGee.</p> <p>16 Q. Okay. Were there any other U.S.</p> <p>17 shareholders of -- of -- to which he's referring?</p> <p>18 A. To my knowledge -- well, he's not</p> <p>19 specific on who he's -- he's referring, but to my</p> <p>20 knowledge, those were the three majority</p> <p>21 shareholders in NCB.</p> <p>22 Q. And Mr. Fiig, as far as you understand,</p> <p>23 is not referring to any other U.S. shareholders?</p> <p>24 A. Not as far as --</p> <p>[REDACTED]</p>

1 GRY AHLEFELD-ENGEL 30(b)(6)
2 THE WITNESS: -- far as I understand.
3 BY MR. LEVY:
4 Q. Okay. And why do you think that he
5 knew -- why would he refer to those three
6 specifically?

8 THE WITNESS: I don't know that I can
9 testify to why Mr. Fiig referred to how he
10 did in his email.

[illegible]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 A. -- "that clarified their overall

5 relationship in connection with the settlement."

6 So I read it as him referring to the

7 settlement, but then again, I would like to point

8 out that --

9 Q. You didn't understand the question.

10 A. I didn't understand the question. I'm

11 not sure I understand it better today.

12 Q. Fair enough.

13 And then in the next sentence he

14 relates -- he -- he says "something about the

15 criminal case"?

16 A. Yes.

17 Q. Okay. And then you indicate in

18 substance that you don't understand the question?

19 A. Yes.

20 Q. Then he insults you?

21 A. Yes.

22 Q. Or you hope was being --

23 A. I think he's being --

24 Q. Joking.

25 A. He's joking.

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1 GRY AHLEFELD-ENGEL 30(b)(6)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

7 So -- so Mr. Hopner -- withdrawn.
8 Mr. Fiig recounts what he learned from
9 Mr. Hopner. Is that a fair summary?
[REDACTED]

11 THE WITNESS: That's what it says, that
12 he's -- Hopner has raised the question. But
13 again I don't -- I can't bear testimony to
14 his dialogue with Hopner.
[REDACTED]
[REDACTED]
[REDACTED]

18 Q. And -- and he raises something in
19 relation to the criminal case. Is that a fair
20 summary?
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Q. And then you respond?

3 A. Yes.

4 Q. This is April 25th, 2019 at 17:38?

5 A. Yes.

6 Q. And you point out the delightful nature

7 of his -- of his use of a conceivably insulting

8 word?

9 A. Yes.

10 Q. And then you -- you write after that,

11 "If your question is whether we release them

12 interest criminal liability with the settlement,

13 the answer is no."

14 A. Yes.

15 Q. And that's -- and why do you say --

16 what's the basis for your having said that?

17 A. That that would not be within our

18 mandate.

19 Q. Skatte didn't have the authority to do

20 that?

21 A. We would not have the authority to

22 release them -- release anybody from any criminal

23 liability. That is not within our tasks as an

24 authority. We have no control over that process,

25 if any.

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 THE WITNESS: We knew that it was a
3 hope that it could have an impact, but my
4 recollection of the time is we were very
5 clear on the fact that we had no influence on
6 that.
7 BY MR. LEVY:
8 Q. But -- but you knew what they were
9 hoping to get out of the settlement agreement?
[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)
[REDACTED]
[REDACTED]
[REDACTED]
5 Q. Okay. And then the next sentence is
6 "they," begins "they"?
7 A. Yes.
8 Q. The same set of people?
9 A. Yes.
10 Q. Mr. Stein, Mr. Lhote, Mr. McGee?
11 A. Yes, I would -- I would say so.
12 Q. Okay. Do you have any doubt that --
13 about that?
14 A. No.
15 Q. Okay. "They hope their cooperation in
16 the civil law track will have a mitigating effect
17 in the criminal, but nothing more."
18 A. Yes.
19 Q. So, Skatte knew what Mr. Stein, and Mr.
20 Lhote, and Mr. McGee were seeking as part of the
21 settlement agreement?
[REDACTED]
23 BY MR. LEVY:
24 Q. Correct?
[REDACTED]

[REDACTED]



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 BY MR. LEVY:

3 Q. Do you want me to clarify the question?

4 A. No, I'm just not sure I agree, because

5 I'm saying I have no influence whatever as

6 Skatteforvaltningen on any criminal liability case

7 that might or might not be there.

8 So -- so, the effect of the settlement,

9 I -- I can't -- I'm not sure I understand how I

10 can affect that with the settlement.

11 I know that they were hoping that their

12 cooperation with the settlement would have some

13 effect.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 Q. You wrote about that "They hope their

7 cooperation in the civil law track will have a

8 mitigating effect in the criminal," right?

9 A. Yes.

10 Q. And you were saying what you understood

11 their hope was, correct?

[REDACTED]

13 THE WITNESS: I understand it more as

14 that they understood I had no influence on

15 that.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 BY MR. LEVY:

23 Q. You wrote, "They hope".

24 A. Yes.

25 Q. And you wrote what they were hoping

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 for, correct?

3 A. Yes, I wrote what they were hoping for.

4 Q. Yeah, so you had some understanding

5 what they were hoping for?

6 A. Yes.

7 Q. Okay. And how did you have that

8 understanding?

9 A. My recollection is that that was

10 verbalized during the negotiations of the

11 settlement.

12 Q. And by whom?

13 A. By their counsel at the time.

14 Q. And the -- what they were hoping for is

15 that their cooperation in the civil law track

16 would have a mitigating effect in the criminal?

17 A. Yes.

18 Q. And what did you -- what did you

19 understand -- or what did you mean -- withdrawn.

20 What did Skatte mean when you said

21 "have a mitigating effect"?

22 A. I understand my words as meaning having

23 any sort of impact.

24 Q. And -- and did you have in your head at

25 the time an idea of what potential mitigation

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 might result?

3 A. I'm not a criminal expert, so, no. But

4 typically in a Danish context, that would be -- if

5 there was at some point a criminal case, that

6 would be -- could be taken into consideration

7 with -- in regard to a sentencing if a guilty

8 sentence was -- would be -- if that would be the

9 judgment.

10 Q. Were they also hoping that it would

11 have an impact on the prosecutor's possible

12 charging decision?

[REDACTED]

14 THE WITNESS: I -- I don't -- I don't

15 have a knowledge about that, but that would

16 not be the -- that would not be the most

17 possible outcome or a possible outcome in

18 Danish law.

19 BY MR. LEVY:

20 Q. You don't know one way or the other?

[REDACTED]

22 THE WITNESS: I don't know one way or

23 the other what their -- their hopes were;

24 more to the effect of an impact, not what

25 specific impact they were hoping for.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 Q. Fair enough.

4 You -- were you aware that in prior

5 discussions that Skatte was involved in that

6 they -- Mr. Stein, Mr. Lhote, and Mr. McGee --

7 were seeking that they be immunized from criminal

8 prosecution in connection with the settlement

9 agreement?

10 A. Yes.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 Q. Sure. You understood that in -- in

21 earlier negotiations relating to the settlement

22 agreement --

23 A. Yes.

24 Q. -- there was discussion about Mr.

25 Stein, Mr. Lhote, and Mr. McGee, and others, being

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 immunized in connection with -- from criminal

3 prosecution?

4 A. I understand, not that there were

5 negotiations about it, because I don't believe

6 we -- again, as I said, we don't have that mandate

7 as an authority, so we cannot negotiate on that

8 subject.

9 I understand that it had been put

10 forward at earlier negotiations as a wish for a

11 term in the -- in the settlement.



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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 Q. And right below that, I want to direct
 3 your attention to that again and just ask you for
 4 what the -- for how it is that you came to know
 5 what hopes Mr. Stein, and Mr. Lhote, and Mr. McGee
 6 had and that are reflected in the sentence that
 7 you wrote after that?

12 A. Okay. I believe that was expressed
 13 during the negotiations.

14 Q. By whom?

15 A. By the three persons' counsel at the
 16 time.

17 Q. And do you remember who that was?

18 A. Ralph Levine I believe his name was.

19 Q. And did -- was that expressed to you --
 20 to -- to you personally?

21 A. No. I was present during most of the
 22 negotiations up 'till the end.

23 Q. And do you remember in what context it
 24 was expressed?

25 A. No.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Q. But you remember it was Mr. Levine?

3 A. I believe he was the one primarily
 4 doing the talking during the negotiations.

5 Q. And who was the person doing the
 6 talking on behalf of Skatte?

7 A. Mr. Weinstein to my left and Bill
 8 McGuire I believe.

9 Q. And do you remember anything more about
 10 what Mr. Levine said?

11 A. No, not in -- not in detail.

12 Q. Do you remember whether Mr. Levine gave
 13 a sense of how important this -- this hope was to
 14 Mr. Stein, and Mr. Lhote, and Mr. McGee?

15 A. Not the degree of importance, but I did
 16 understand that it was of importance.

17 Q. You don't have a sense of how
 18 important?

19 A. No, I don't -- I can't say to what
 20 degree.

21 Q. It was important; you can't say how
 22 important?

23 A. No.

24 Q. Is that a fair summary?

25 A. That's a fair summary.

[illegible]

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6) Page 88</p> <p>[REDACTED]</p> <p>22 Q. Was there ever a process by which any</p> <p>23 drafts of the settlement agreement were</p> <p>24 communicated from Skatte to SOIK?</p> <p>25 A. I don't believe so, no. We didn't send</p>



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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 the drafts of the settlement agreement to SOIK.
 3 Q. Okay. Why not?
 4 A. SOIK was not a -- a part of the -- of
 5 the settlement agreement. There was no -- I don't
 6 think there was a -- again, I don't know at what
 7 point -- I don't know -- again before my personal
 8 knowledge, so before I came in, I didn't know what
 9 the discussions were back then. There was a
 10 confidentiality to consider, the confidentiality
 11 of the agreement, and we informed them on what
 12 they needed to know and should know about the
 13 settlement and where it was in process.
 14 Q. And what -- what did Skatte believe
 15 SOIK needed to know about the settlement
 16 agreement?
 17 A. As I told you before, what we on a
 18 continually basis told them at that time and
 19 during the settlement agreements I believe earlier
 20 on in the negotiations, it would have been more
 21 along the lines of process: This is where the
 22 settlement is going; we are in negotiations with
 23 the group of people, and the closer we got to the
 24 final date, it would have been more along the
 25 lines of the general terms of the -- of the

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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 settlement.
 3 Q. Did -- did Skatte ever provide to SOIK
 4 a copy of the settlement agreement after it was
 5 executed?
 6 A. Not to my knowledge, no.
 7 Q. Never?
 8 A. No.
 9 Q. Why not?
 10 A. Oh -- excuse me. I think we actually
 11 did when it was made -- when it went into the case
 12 and it was made public here in the states. I
 13 think we provided it to SOIK at that time.
 14 Q. When was that?
 15 A. That must have been sometime in 2023.
 16 Q. When you say "the case," do you mean in
 17 connection with this litigation?
 18 A. Yes, this litigation. Yes.
 19 Q. So prior to that you're not aware of an
 20 instance in which Skatte provided to SOIK a copy
 21 of the settlement agreement?
 22 A. No.

1 GRY AHLEFELD-ENGEL 30(b)(6)

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	85	15
30-49	85	15
50-69	85	15
70+	85	15

[illegible]

Age Group	Percentage of Respondents
18-29	95%
30-49	92%
50-64	88%
65+	65%

Age Group	Percentage of Respondents
18-29	90%
30-49	85%
50-64	80%
65 and older	60%

25 A. Not actively. It was -- it was -- it



Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

<p>[REDACTED]</p>	<p style="text-align: right;">Page 107</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Q. Did you understand the question?</p> <p>3 A. It was consent to sharing of this?</p> <p>4 Q. Okay, great.</p> <p>5 A. No, I'm asking you a question.</p> <p>6 Q. Okay, you want me to clarify the</p> <p>7 question?</p> <p>8 A. Yes, please.</p> <p>9 Q. Okay, fair enough. Consent to share</p> <p>10 this text, the -- the one, two three components of</p> <p>11 the settlement agreement that are reflected in</p> <p>12 Exhibit 103.</p> <p>13 A. I believe that they did.</p> <p>14 Q. Okay.</p> <p>15 A. Because I do actually share it at a</p> <p>16 later point.</p> <p>17 Q. Okay. And when you did share it, was</p> <p>18 it Skatte's intent that that be a way of fully</p> <p>19 complying with section 8(f)?</p> <p>20 A. If it was our intent?</p> <p>21 Q. At the time that the sharing of this</p> <p>22 text was the means by which Skatte actually</p> <p>23 complied with the obligations of 8(f).</p> <p>24 A. I don't remember what our intent was at</p> <p>25 the time, but the fact was that we did share it,</p>
<p style="text-align: right;">Page 106</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>19 Q. Okay. And are you aware that Wachtel</p> <p>20 gave its consent?</p> <p>21 A. That is my understanding, that they</p> <p>22 did, yes.</p> <p>23 Q. Okay, and how do you know that?</p> <p>24 MR. WEINSTEIN: Just consent to what?</p> <p>25 BY MR. LEVY:</p>	<p style="text-align: right;">Page 108</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 and I do find that we were complying by that.</p> <p>3 Q. Was it Skatte's plan at the time that</p> <p>4 the sharing of -- of the text of 8(f) was actually</p> <p>5 compliant with section 8(f)?</p> <p>[REDACTED]</p> <p>8 Q. At the time.</p> <p>9 A. I -- I -- again, as I said, mine or our</p> <p>10 intent at the time, I don't remember if we did</p> <p>11 share it, and I do find that by sharing it we are</p> <p>12 complying with 8(f).</p> <p>13 Q. But when you say you do find, what do</p> <p>14 you mean?</p> <p>15 A. That's what -- that's how I find that</p> <p>16 we, among other, comply with 8(f) and our</p> <p>17 obligations under 8(f).</p> <p>18 Q. When the first time you believed that</p> <p>19 by sharing the text of 8(f) Skatte had complied</p> <p>20 with section 8(f)?</p> <p>21 A. When was the first time I believed it?</p> <p>22 Q. Uh-huh.</p> <p>23 A. I don't know when was the first time I</p> <p>24 believed it. I think being posed the question</p> <p>25 whether or not I'm complying with 8(f), I believe</p>



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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 that I am.
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 11 Q. You have no recollection that in
 12 Skatte's mind Skatte intended to comply with
 13 section 8(f) by sharing the text of 8(f)?
 14 A. No, I have no recollection of me at the
 15 time thinking when I'm doing this, I'm complying
 16 with 8(f).
 17 Q. And did anyone else?
 18 A. I don't know.
 19 Q. Well, you're here as a representative
 20 of Skatte, right?
 21 A. Yeah.
 22 Q. Okay. So did you talk to anyone in
 23 order to find out the answer about what others
 24 thought the sharing of section 8(f) meant?
 25 A. In preparing for this?

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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 Q. Uh-huh.
 3 A. No, I haven't talked to anybody about
 4 the -- what they thought about the sharing of
 5 this.
 6 Q. Other than looking in documents and
 7 meeting with your counsel, did you talk to anyone
 8 in preparation for your testimony?
 9 A. No, I didn't talk to anybody in
 10 preparation about the subject matters --
 11 Q. Okay.
 12 A. -- of my deposition, no.
 [REDACTED]
 [REDACTED]
 [REDACTED]
 16 Did Skatte ever formulate a plan about
 17 how it was intending to comply with Section 8(f)?
 18 A. No.
 19 Q. And -- and tell me, ma'am, when Skatte
 20 did comply with Section 8(f).
 21 A. When did it comply with Section 8(f)?
 22 Q. Uh-huh.
 23 A. I think we complied with Section 8(f)
 24 by several -- several communications to SOIK, one
 25 being me sending the text of this email to Per

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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 Fiig. I think it was in or around April 20th, I'm
 3 sending Per Fiig the excerpts. I don't know if
 4 it's exactly the same as these, but an excerpt
 5 about the -- about the former -- was it 8(d) at
 6 the time that became 8(f) on -- I don't know if on
 7 the same day or at a later date, but in close
 8 connection to I sent Per Fiig the list of the
 9 covered parties --
 10 Q. Mm-hmm.
 11 A. -- of the -- of the settlement.
 12 Q. And at the time that occurred, did --
 13 MR. WEINSTEIN: Just sorry. Were you
 14 done with your answer?
 15 THE WITNESS: Not completely done
 16 with --
 17 BY MR. LEVY:
 18 Q. Please go ahead. Sorry.
 19 A. -- the whole -- the whole --
 20 Q. Sure, give me your list.
 21 A. I'm giving you my list.
 22 In the days up to the final execution
 23 of the settlement or the signing of the
 24 settlement, there is -- as you pointed out
 25 yourself earlier -- correspondence going back and

Page 112

1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 forth between Steen, and Morten, and SOIK about
 3 the press release that is later in fact executed
 4 on May 29th after the settlement was signed in
 5 which we list the main terms of the settlement --
 6 settlement amount; number of settling parties that
 7 I have previously sent to Mr. Fiig; what the
 8 settled amount represents -- it is what the
 9 settling parties received out of the total sum of
 10 the 2.9 -- that the settling parties have agreed
 11 to cooperate with Skatte about its ongoing cases;
 12 that we find that this settlement is a victory for
 13 Skatte. It's a good settlement.
 14 So that is the total of -- of how I
 15 find that we do comply --
 16 Q. And when you say --
 17 A. -- with 8(f).
 18 Q. Are you done?
 19 A. Now I'm done.
 [REDACTED]
 21 And when you say you find that, when
 22 was the first time that you concluded that sending
 23 the text of these provisions -- I'm going to show
 24 you the email in a moment.
 25 A. Yeah.



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Q. -- sending the list of the covered

3 parties and the press release resulted in Skatte's

4 having complied with Section 8(f)?

5 When was the first time that anyone at

6 Skatte's ever believed that that was the case?

THE WITNESS: I don't think that I can

give you a time that when we believed that

this was the specific document that we found

complied with it. I don't think we were at

ever -- at any point ever -- that we ever

doubted that we had complied with it.

There was so much communications, in

writing, reaffirmed by -- in meetings,

reaffirmed in communications by phone call.

We were in continually dialogue with SOIK at

the time.

So I don't think we ever doubted that

we were not in compliance.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

Q. So any of the -- do -- does Skatte have

the view now that any of the oral communications

are compliant with section 8(f)?

A. No. I have the view that the oral

communications that we had with SOIK, that's

reaffirmations of the -- the communications we

also had with SOIK in -- in writing.

So I mean that what we communicated to

SOIK, it's both in writing, and we did reaffirm it

in telephone conversations, and ending up I think

at a meeting in June at some point we tied the

final knots about the settlement at that point.

Q. But the -- the writings that you say

you find resulted in compliance with section 8(f)

are the sending of the text, the sending of the

list of covered parties, and the press release on

May 29th, correct?

THE WITNESS: I'm saying I rely on yes

the text with the wording of what later

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 became 8(f), the list of the covered parties,

3 the press releases and the contents of that

4 press release, which were in fact in writing,

5 yes.

Q. Those are the means by which, according

to you, Skatte complied with 8(f)?

A. Yes.

Q. Okay. Did anyone ever communicate at

any point in time within Skatte that Skatte had

complied with section 8(f)?

A. Communicate to who?

Q. Within Skatte, any one part of

Skatte -- any one person within Skatte

communicated to any other person at Skatte, we've

done what we're required to do under say section

8(f)?

A. We possibly said to each other, now we

have complied? No, because there was never any

doubt that we had complied. That would be a

dialogue between me and Steen, because we were the

ones involved in this, nobody else.

Q. You -- you and Mr. Bechmann were the --

were the only people who were responsible for

Page 116

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 complying with section 8(f).

A. We were the ones --

Q. Is that your testimony?

A. We were the ones responsible for the

settlement, and -- well, per default, yes.

Q. Did anyone ever think at the time that

providing the text of section 8(f) to SOIK was a

means of complying with section 8(f)? Did you

have -- did you personally ever have that thought?

A. That "Now I'm hereby complying with

8(f)"?

Q. Or complying in part with -- with

section 8(f).

A. No, I don't believe I had that positive

thought.

Q. Okay. And do you remember the first

time you ever thought that?

A. No, I don't recall the first time I

thought that. I mean --

Q. Was it in connection with this

litigation --

MR. WEINSTEIN: Just, I'm not sure she

was done. Were you done? You said, I

mean --



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 BY MR. LEVY:

3 Q. I didn't hear that. I apologize. Were

4 you finishes with your answer?

5 A. No, I would like to elaborate a little

6 bit, actually.

7 Q. Please.

8 A. At the time, as I said, we were not in

9 doubt whether or not we had complied. Of course,

10 in preparing for this case, I'm delving more in

11 the material of the case, so this material

12 supports my understanding of us complying with it

13 back then.

14 If you're again asking me whether or

15 not I thought at the time, so now I'm sending SOIK

16 the wording of 8(f), that is me complying with

17 8(f), I don't think I did that positive connection

18 at the time.

19 Q. Mm-hmm.

20 A. But again back to being we were not in

21 doubt on whether or not we had complied, because

22 the communication with SOIK was numerous, it was

23 continually over the -- from the two weeks, and

24 even before, but picking up a lot the two weeks up

25 to the execution of the settlement and afterwards

Page 118

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 as well.

3 Q. The writings are the means of

4 compliance with section 8(f), correct?

5 A. That is -- that is what I'm saying,

6 that I'm relying on that as my --

7 Q. Right, that is the only means of

8 complying with 8(f), correct?

9 A. That is how I complied with it, yes.

Age Group	Percentage of Respondents
18-29	85%
30-49	82%
50-64	78%
65+	75%

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 Q. But you're positive that you had no

6 doubt that you can complied with section 8(f)?

7 A. Yes.

8 Q. That you're -- that you're certain of?

9 A. Yes.

10 Q. But the -- but the -- but the means --

11 A. That was -- that was --

12 Q. Go ahead, please, finish your answer.

13 A. But we -- we were never in doubt about

14 it. The communication was there. It was in

15 writing. It was also in supplement to that we had

16 meetings. We had telephone dialogues. It was

17 continually in the period up to the execution of

18 the settlement and in the period after.

19 So, it was never a question of whether

20 we had complied or not. We had. We did.

Response	Percentage
U.S. should take action	85%
U.S. should take action	80%
U.S. should take action	75%
U.S. should take action	70%
U.S. should take action	65%
U.S. should take action	60%
U.S. should take action	55%
U.S. should take action	50%
U.S. should take action	45%
U.S. should take action	40%
U.S. should take action	35%
U.S. should take action	30%
U.S. should take action	25%
U.S. should take action	20%
U.S. should take action	15%
U.S. should not take action	15%
U.S. should not take action	20%
U.S. should not take action	25%
U.S. should not take action	30%
U.S. should not take action	35%
U.S. should not take action	40%
U.S. should not take action	45%
U.S. should not take action	50%
U.S. should not take action	55%
U.S. should not take action	60%
U.S. should not take action	65%
U.S. should not take action	70%
U.S. should not take action	75%
U.S. should not take action	80%
U.S. should not take action	85%



20 In the middle of the last page of the
21 email by which you're checking with Mr. Bechmann
22 about sending the text to SOIK --
23 A. Yes.
24 Q. -- it refers to "sharing the agreement
25 and the cooperation material with SOIK".

12 Q. Okay. What are you referring to when
13 you -- when you refer to cooperation material?
14 A. I'm referring to material, any material
15 that might come out of -- come out of the
16 cooperation obligation that the settling parties
17 have agreed to in the settlement.

14 Q. Did -- did Skatte receive cooperation
15 material from the covered parties?
16 A. Skatte's representatives received
17 material from the -- or for the covered parties,
18 yes.
19 Q. And did it share that material with
20 SOIK?
21 A. No.
22 Q. Why not?
23 A. We have not -- I don't think we have an
24 obligation to share it, and we have not shared it
25 with SOIK.

2 Q. Do you know whether SOIK ever asked for
3 it to be shared with it?
4 A. Not on top of mind. I don't remember
5 if it is in any of the questions following up in
6 2021. I don't recall.

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5

<p>[REDACTED]</p>	<p style="text-align: right;">Page 135</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>8 (Email chain was marked Skatte Exhibit</p> <p>9 105, for identification.)</p> <p>10 (Witness reviews document.)</p> <p>11 BY MR. LEVY:</p> <p>12 Q. Ready?</p> <p>13 (Witness nods head in the affirmative.)</p> <p>14 Q. This is the email that you made</p> <p>15 reference to before as one of the means by which</p> <p>16 Skatte complied with 8(f) in -- in your view?</p> <p>17 A. Yes.</p> <p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>



[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)
[REDACTED]
[REDACTED]
4 Do you -- was there any other instance
5 of the text of the settlement agreement or part of
6 the text of the settlement agreement being sent by
7 Skatte to SOIK?
8 A. Other than this?
9 Q. Other than this.
10 A. I believe that I re-sent actually this
11 email in September of that same year.

[REDACTED]

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)
[REDACTED]
[REDACTED]
4 I'm going to show you what I'm going to
5 ask the reporter to mark as Exhibit 106.
6 (Press release was marked Skatte
7 Exhibit 106, for identification.)
8 BY MR. LEVY:
9 Q. Do you recognize that?
10 (Witness reviews document.)
11 A. Yes, I do. I believe it's the press
12 release I referred to earlier.

[REDACTED]



<p>[REDACTED]</p>	<p style="text-align: right;">Page 143</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>5 So could I ask you to look at section</p> <p>6 2(e).</p> <p>7 A. Of the settlement?</p> <p>8 Q. Of the settlement agreement. It's on</p> <p>9 page six.</p> <p>10 A. Yes.</p> <p>[REDACTED]</p>
<p>[REDACTED]</p>	<p style="text-align: right;">Page 144</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>7 Q. And is it -- is it fair to say that</p> <p>8 the -- the initial paragraph of 2(e) permits the</p> <p>9 deduction of expenses?</p> <p>10 A. Yes, some expenses.</p> <p>11 Q. Not all?</p> <p>12 A. As defined in --</p> <p>13 Q. A defined set of expenses?</p> <p>14 A. A defined set of expenses, agreed.</p> <p>[REDACTED]</p> <p>20 Q. And the -- the things that are</p> <p>21 contained in 2(e)(b) less B, those are all</p> <p>22 expenses?</p> <p>23 A. All of the covered parties' expenses</p> <p>24 associated with reclaims applications for which</p> <p>25 Skatteforvaltningen made payments.</p>

Age Group	Percentage of Respondents
18-29	90%
30-49	85%
50-64	80%
65+	60%

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists 14 categories combining age and gender. The x-axis represents the percentage, ranging from 0 to 100. The bars are colored in shades of blue and green. The data shows that younger age groups (18-29) generally have higher percentages of respondents who believe the U.S. should take action to address climate change, with 100% for 18-29 females and 95% for 18-29 males. The percentage decreases as age increases, with 70+ respondents showing the lowest percentages (55% for males and 65% for females).

Age Group	Gender	Percentage
18-29	Female	100%
18-29	Male	95%
30-49	Female	90%
30-49	Male	85%
50-69	Female	80%
50-69	Male	75%
70+	Female	65%
70+	Male	55%
18-29	Female	100%
18-29	Male	95%
30-49	Female	90%
30-49	Male	85%
50-69	Female	80%
50-69	Male	75%
70+	Female	65%
70+	Male	55%
18-29	Female	100%
18-29	Male	95%
30-49	Female	90%
30-49	Male	85%
50-69	Female	80%
50-69	Male	75%
70+	Female	65%
70+	Male	55%

<p>[REDACTED]</p>	<p style="text-align: right;">Page 155</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>9 Does the press release say that the</p> <p>10 settlement agreement is in the best interest of</p> <p>11 Skatte?</p> <p>12 A. It doesn't say in those exact words,</p> <p>13 but it -- I -- the -- the -- the effect of that</p> <p>14 is -- I think there are several places. Let me</p> <p>15 just find them.</p> <p>[REDACTED]</p> <p>17 A. So it says in paragraph four, "The</p> <p>18 settlement is a" -- I don't know how to -- can I</p> <p>19 just have a word translated?</p> <p>20 Q. Of course.</p> <p>[REDACTED]</p> <p>23 THE WITNESS: (Through the interpreter)</p> <p>24 It's a decisive victory.</p> <p>25 (In English) It's a decisive victory</p>
<p>[REDACTED]</p>	<p style="text-align: right;">Page 156</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 or a big victory. That's the intent of the</p> <p>3 word, right?</p> <p>4 (Through the interpreter) Material,</p> <p>5 considerable.</p> <p>6 (In English) The concept of it is it's</p> <p>7 a big win for Denmark. It's a big win is</p> <p>8 what that says. The settlement should be</p> <p>9 seen as a big win.</p> <p>10 So that's one part where it says, and</p> <p>11 then further down in the quotation of Merete</p> <p>12 Agergaard, it says, "I'm very happy with the</p> <p>13 work that's been put in. Trying to bring</p> <p>14 home the 12.7B has paid out," or "given a</p> <p>15 result."</p> <p>16 And then again, further on, quoting</p> <p>17 Steen I think it is, "The settlement</p> <p>18 agreement is a big step."</p> <p>19 So I don't believe the exact wording is</p> <p>20 in the best interest of Skatte, but that's</p> <p>21 the effect of it, those, those --</p> <p>22 BY MR. LEVY:</p> <p>23 Q. In -- in your opinion?</p> <p>24 A. In my opinion.</p> <p>[REDACTED]</p>



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Does the -- does the press release

3 indicate that the -- there had been provided by

4 the covered parties' designees a form of security

5 for payment of the final settlement amount?

6 A. The confessions of judgment?

7 Q. Uh-huh.

8 A. No, that doesn't --

9 Q. Okay.

10 A. -- refer to that in the press release.

11 Q. And does it say that the covered

12 parties' designees would pay interest under

13 certain circumstances?

14 (Witness reviews document.)

15 A. No, I don't believe it says in this

16 one. It's -- I think that's at a -- a later point

17 I think one of the press releases are addressing

18 the interest. I don't think this one addresses

19 the interest.

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 A. So these press releases, they were not

25 sent out by us solely. They were run through your

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 clients' lawyers at the time. So this was an

3 agreed line of communication with them as well.

4 I just want that fact to be reflected

5 as well.

6 Q. And did you ever tell Mr. Stein, and

7 Mr. Lhote, and McGee's -- and Mr. McGee's lawyers

8 that at the time the press release was the

9 means -- was one of the means by which Skatte was

10 going to comply with section 8(f)?

11 A. No.

12 Q. Did -- did Skatte communicate that to

13 anyone outside of Skatte ever?

14 A. I don't believe we did, no.

15 [REDACTED]

16 Does the -- does the press release

17 explain the process by which the true-up amount

18 would be calculated and then obtained?

19 (Witness reviews document.)

20 A. No.

21 Q. And -- and other than the paragraph

22 that we looked at before about the cooperation,

23 does the settlement agreement describe in any --

24 in any other way the various requirements that

25 the -- that the covered parties took on relative

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 to cooperation?

3 A. Anywhere in the press release?

4 Q. Uh-huh.

5 A. Or in the settlement?

6 Q. No, in the press release. Does it

7 describe any other aspects of cooperation?

8 A. No, not other than the ones we've been

9 through.

10 [REDACTED]

11 Does the press release say that Skatte

12 will communicate with SOIK certain things that are

13 set out in section 8(f)?

14 A. No.

15 Q. Why not?

16 A. That would be an unnatural place to put

17 that we would communicate that to SOIK.

18 Q. The -- the -- there was an awful lot of

19 energy spent communicating with SOIK about what

20 would and wouldn't be in the press release.

21 Is that fair to say?

22 [REDACTED]

23 THE WITNESS: That is fair.

24 BY MR. LEVY:

25 Q. And a lot of that effort involved

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 clarifying the relationship between Skatte and the

3 criminal endeavor that SOIK was engaged in,

4 correct?

5 A. The -- the fact that we didn't have any

6 influence on the criminal endeavor. We couldn't

7 undertake any obligations towards the criminal --

8 any criminal endeavor that there might be based on

9 the reports that we filed to SOIK.

10 Q. Right, but they -- the one time -- the

11 one instance in the settlement agreement that does

12 actually relate to the relationship between Skatte

13 and SOIK is not present in the -- in the press

14 release, correct?

15 A. Correct.

16 Q. And -- fair enough.

17 And other than the -- the part of the

18 press release that relates to the four years and

19 the 650, which consists of 650, does the

20 settlement agreement -- withdrawn -- does the

21 press release refer to any aspect of the letter

22 agreement?

23 A. No.

24 Q. Does it make reference to the fact that

25 the -- that there would need to be liquidated

Age Group	Should Take Action	Should Not Take Action
18-29	95%	5%
30-49	95%	5%
50-69	95%	5%
70+	95%	5%

Device Type	Percentage of Respondents
Smartphone	95%
Tablet	85%
Smartwatch	45%
Smart TV	35%
Smart Home Assistant	30%
Smart Car	25%
Smart Thermostat	20%
Smart Light Bulb	15%
Smart Door Lock	10%
Smart Security Camera	5%



<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p style="text-align: right;">Page 172</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 [REDACTED]</p> <p>3 BY MR. LEVY:</p> <p>4 Q. It is the back and forth between Skatte</p> <p>5 and SOIK leading up to the press release and the</p> <p>6 press release itself --</p> <p>7 A. That's what all the back and forth with</p> <p>8 SOIK is about. That's the contents of the press</p> <p>9 release.</p> <p>10 So it's both the back and forth, and</p> <p>11 the contents of the press release.</p> <p>12 Q. And is there anyone who at the time</p> <p>13 that those -- those email interchanges were</p> <p>14 occurring who believed that that was a means of</p> <p>15 complying with 8(f)?</p> <p>16 A. I have answered that as well, I</p> <p>17 believe, numerous times.</p> <p>18 Q. And the answer is no, correct?</p> <p>19 A. The answer is we didn't again say, "So</p> <p>20 we hereby comply to 8(f)," but it is my belief</p> <p>21 that by doing so we did in fact comply with 8(f).</p> <p>22 Q. Did you believe that at the time?</p> <p>23 A. I don't know how to answer your</p> <p>24 question.</p> <p>25 Q. It's a very simple question.</p>

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. I -- and I have answered it many times

3 now.

4 Q. And the answer is no, you did not think

5 that at the time?

6 [REDACTED]

7 THE WITNESS: My answer is I did not at

8 the time say, "So I'm hereby complying with

9 8(f)."

10 We had no reason to believe at the time

11 that we were not complying. We were.

12 BY MR. LEVY:

13 Q. But no one thought that at the time?

14 [REDACTED]

15 THE WITNESS: Again, I think I've

16 answered your questions.

17 BY MR. LEVY:

18 Q. You may answer.

19 A. I have answered that.

20 Q. The answer is no one thought that at

21 the time, correct?

22 [REDACTED]

23 THE WITNESS: I'm sorry, I don't know

24 how to phrase it any way else than what I

25 have phrased it.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 At the time I did not have a thought in

3 my mind saying -- I don't believe I did have

4 a thought in my mind saying, "I hereby comply

5 to 8(f) by doing this."

6 [REDACTED]

7 [REDACTED]

8 A. The fact of the matter is I rely on

9 that, in doing so, we complied with 8(f).

10 Q. Now you're relying on that?

11 A. That's what I'm are relying on, yes.

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 Q. Let me show you what I'm going to ask

22 the reporter to mark as 108.

23 A. Yes.

24 (Email chain was marked Skatte Exhibit

25 108, for identification.)

Page 175

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 BY MR. LEVY:

24 Q. Do you have Exhibit 108 in front of

25 you?

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. I do.

3 Q. Okay. This is an email from -- from

4 you to Mr. Fiig?

5 A. Yes.

6 Q. From May 21st, 2019?

7 A. Correct.

8 Q. And this is what you've referred to

9 before as the means by which Skatte provided the

10 list of covered parties to Mr. Fiig?

11 A. Yes.

12 Q. Okay. Let me just make sure I

13 understand what's attached.

14 The first page lists various exhibits,

15 but all those exhibits are not what was sent to

16 Mr. Fiig?

17 (Witness reviews document.)

18 A. No, I believe it's only Exhibit 1 is

19 there, Exhibit 1B is there, 1C is there, Exhibit 2

20 is there, Exhibit 3, 3A, 3B, 3C.

21 Q. Okay.

22 A. Exhibit 4 and 5 are not attached to

23 this.

24 Q. Okay, were not provided to Mr. Fiig.

25 Okay.



[illegible]

Page 185

1 GRY AHLEFELD-ENGEL 30(b)(6)
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 8 If I could ask you to refer to Exhibit
 9 104, the settlement agreement.
 10 A. Yes.
 11 Q. And in particular the definition -- a
 12 couple of the definitions contained on page three.
 13 A. I'm there.
 14 Q. Yes. And in particular in the middle
 15 it defines "covered parties," and then right below
 16 it it defines "covered parties' designees."
 17 A. Yes.
 18 Q. And you agree with me that the covered
 19 parties' designees are also covered parties?
 20 A. Yes.
 21 Q. The covered parties is a large set
 22 of -- of people and entities, and three of them
 23 are covered parties' designees?
 24 A. I agree with you on that.
 25 Q. Okay, great.

Page 186

1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 So if I refer to the covered parties --
 3 A. Sorry.
 4 Q. That's okay. I'm going to stop,
 5 because I want to make sure you hear the question
 6 and give you time.
 7 So if I refer to the covered parties
 8 that are not covered parties' designees, you would
 9 understand to whom I'm referring?
 10 A. Covered parties that are not covered
 11 parties' designees? That would be everybody but
 12 Jerome Lhote, Matthew Stein, and Luke McGee, yes.
 13 Q. Everyone who -- who is a party to the
 14 settlement agreement minus --
 15 A. Minus the three.
 16 Q. Yes.
 17 A. Yes.
 18 Q. Can we agree upon that?
 19 A. That we can agree upon.
 20 Q. Okay, great.
 21 Do the covered parties that are not
 22 covered parties' designees have any present
 23 obligation to make any payments under the
 24 settlement agreement?
 [REDACTED]

Page 187

1 GRY AHLEFELD-ENGEL 30(b)(6)
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 9 Do the covered parties that are not
 10 covered parties' designees have any present
 11 obligation to make any payments under the
 12 settlement agreement?
 [REDACTED]
 14 THE WITNESS: I think I need you to be
 15 more specific. I haven't memorized the
 16 settlement agreement, so.
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Page 188

1 GRY AHLEFELD-ENGEL 30(b)(6)
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 15 Did the covered parties that are not
 16 covered parties' designees -- everyone who signed
 17 the settlement agreement, less Mr. Stein, Mr.
 18 Lhote, and Mr. McGee -- do they have any
 19 obligation to pay any money to Skatte under the
 20 settlement agreement?
 21 MR. WEINSTEIN: Objection.
 22 THE WITNESS: Yes.
 23 BY MR. LEVY:
 24 Q. Yes?
 25 A. Yes. They had an obligation -- the --



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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 the whole of the covered party had an obligation
3 to pay the initial cash payment, and my
4 understanding is that the subsequent cash payment
5 was an obligation placed on Stein, Lhote, and
6 McGee.

8 So the initial cash payment has been
9 paid?

10 A. Correct.

11 Q. Okay. And it was paid in 2019?

12 A. Yes.

19 Presently, right now, do the covered
20 parties that are not covered parties' designees,
21 have a payment obligation to Skatte under the
22 settlement agreement?

23 A. That's not my understanding, no.

24 Q. No.

25 A. Correct.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Q. Okay. Thank you. I'll ask it a
3 simpler way now.

4 At this point in time only the covered
5 parties -- only the covered parties -- withdrawn.
6 I'm going to ask the converse question, but the
7 same point that I'm trying to make sure I
8 understand is, at this point in time, currently,
9 only the covered parties' designees owe money to
10 Skatte under the settlement agreement?

11 A. That is my understanding, yes.

12 Q. Thank you. I'm going to ask you to
13 look at paragraphs 160 and 161 of the -- of
14 Exhibit 111.

15 A. One eleven, 160 and 161.



<p>[REDACTED]</p>	<p style="text-align: right;">Page 195</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 BY MR. LEVY:</p> <p>3 Q. Do you know whether -- withdrawn.</p> <p>4 Yes.</p> <p>5 A. If I knew specifically in --</p> <p>6 Q. If you know now.</p> <p>7 A. Well, the -- let me just -- so the</p> <p>8 whole point of this, as I understand it, is making</p> <p>9 the determination of the final settlement amount.</p> <p>10 In doing that, we were provided, as I understand</p> <p>11 it, with documentation showing the transactions</p> <p>12 from Skatte into accounts in NCB and what fees</p> <p>13 were paid on those accounts.</p> <p>14 So, it would reason to say that the</p> <p>15 money in those accounts were, if not all of it,</p> <p>16 then at least some of it came from the Danish</p> <p>17 dividend refunds, or alleged dividend refunds.</p> <p>18 Q. So the -- the -- the funds in the</p> <p>19 account were associated with refund claims paid by</p> <p>20 Skatte?</p> <p>21 A. I don't know if they were solely from</p> <p>22 refunds from Skatte, but again, it would stand to</p> <p>23 reason that at least some of it was, or it would</p> <p>24 not make any sense that we were calculating what</p> <p>25 sort of fees that were paid on such accounts.</p>
<p style="text-align: right;">Page 194</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>18 Q. And do you know what the relationship</p> <p>19 between the assets in those accounts -- withdrawn.</p> <p>20 Do you know what -- what -- whether</p> <p>21 there was a relationship between the assets in</p> <p>22 those accounts and refunds paid by Skatte?</p> <p>[REDACTED]</p> <p>24 THE WITNESS: Specifically if I knew?</p> <p>[REDACTED]</p>	<p style="text-align: right;">Page 196</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Q. Okay. So there is an association</p> <p>3 between the assets in the account and the refund</p> <p>4 claims?</p> <p>[REDACTED]</p> <p>6 THE WITNESS: At least to some extent,</p> <p>7 yes.</p> <p>[REDACTED]</p> <p>9 Q. Okay. Very good. Thank you.</p> <p>10 Let me ask you to look at --</p> <p>11 A. And just to be sure, I'm saying that</p> <p>12 without having insight into the exact account and</p> <p>13 the movements in and out of the account.</p> <p>14 Q. But you prepared yourself to testify to</p> <p>15 the concepts that are reflected in paragraph 161?</p> <p>16 A. Of the concepts, yes.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

[illegible]

Response	Percentage
U.S. should take action	85%
U.S. should not take action	15%

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5

[illegible]

[illegible]

[illegible]

Age Group	Percentage of Respondents
18-29	90%
30-49	85%
50-64	80%
65+	60%

[illegible]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 Q. It indicates in English -- you'll look

5 at the -- the Danish, it says "Executive Secretary

6 at Special Control"?

7 A. Yes.

8 Q. Is that the unit that you personally

9 are employed in?

10 A. Yes.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21 Q. What -- I'll jump ahead and I'm going

22 to show you these materials later on, but were

23 they some of the people who drafted some of the

24 correspondence between -- withdrawn, some of the

25 correspondence from Skatte to SOIK in early 2021?

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. It was, yes.

3 Q. And -- and is it the same procedure

4 whereby they might draft something and you would

5 edit it, and they would redraft and you would

6 re-edit it?

7 A. Yes.

8 Q. So you were personally involved in

9 drafting those -- those letters in response to

10 SOIK's inquiries?

11 A. Yes.

12 Q. Was that something that happened --

13 was -- do you -- do you remember the -- the

14 drafting of those letters well?

15 A. I remember the letters of them, the

16 process of drafting them to some extent, yes.

17 Q. But you remember being personally

18 involved in --

19 A. Yes.

20 Q. -- in the drafting?

21 A. Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 Had that kind of inquiry been made by
18 SOIK on any other occasion that you can remember?
19 A. In any other case?
20 Q. Yeah.
21 A. Not in my time, but I've only had the
22 one case in -- in my time. The rest of my work is
23 a different type of work.
24 Q. And since those pieces of
25 correspondence, was there any other inquiry like

2 that from SOIK?

3 A. In this case or in any case?

4 Q. In any -- in any other case.

5 A. Again, not to my personal knowledge.

6 I -- I only have the responsibility of

7 this one case. I'm not a case -- my department is

8 not a case-producing department. I have an

9 analytic department, I have a management

10 secretary, and I have a financial secretary that

11 controls all of the money we have in the -- in

12 the -- in the -- in the unit, the antifraud unit.

13 So I have one case. That's the

14 dividend case. So I wouldn't have anything to

15 compare it to is my point.

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

8 Are there other annotated agendas like
9 this for other meetings that occurred between
10 Skatte and SOIK?
11 A. At any time or?
12 Q. In relation to the dividend case, your
13 one case.
14 A. Yeah, there might be on different
15 topics, but pertaining to -- to the period that
16 we're talking to, I'm only aware of this one.
17 Q. And -- and do you recall why this
18 particular meeting was -- was summarized in the
19 detail that's contained in this Exhibit 114?
20 A. Well, I believe we were in the middle
21 of COVID at this point, so everybody was attending
22 the meeting from different places. We were not
23 communicating in the same manner as we used to.
24 Back in 2019 when we entered into the
25 settlement, that was the -- we were very involved

1 GRY AHLEFELD-ENGEL 30(b)(6)
2 in it. That was what -- what was primarily
3 happening at that time. We were talking together
4 all the time. We were working in the same office.
5 At this point in time we were not any more. So we
6 had to, you know, correspond in -- in different
7 ways, prepare in different ways.
8 So I assume that is why we do it in --
9 in this manner at this -- at this point in time.
10 Q. And was there -- was there any update
11 about the performance pursuant to the agreement by
12 the covered parties?
13 A. The performance of?
14 Q. By the covered parties under the
15 agreement.
16 MR. WEINSTEIN: Can I just ask for
17 clarification. Do you mean at this meeting
18 or --
19 MR. LEVY: Yes.
20 MR. WEINSTEIN: -- just general? Okay.
21 MR. LEVY: And then I'll get more
22 general. Thank you.
23 THE WITNESS: About the performance.
24 Performance of payment? Performance of --
25 any specifics?



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2

3 BY MR. LEVY:

4 Q. The covered parties were required to do

5 a series of things after the initial payment.

6 A. Yeah.

7 Q. Correct?

8 A. Yes.

9 Q. And that series of things included

10 quarterly reports, correct?

11 A. Yes.

12 Q. And cooperation?

13 A. Yes.

14 Q. And if possible the making of payments,

15 correct?

16 A. Yes.

17 Q. Okay. And was there anything that

18 Skatte was required to do that you can remember

19 after the signing of the settlement agreement?

20 A. That we were required to do after the

21 signing?

22 Q. Yeah, besides comply with 8(f), which

23 we've talked about.

24 Was there anything specific that you

25 remember being an obligation of -- of Skatte?

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. It's -- it's very broadly phrased. Can

3 you be more specific and point me in the right

4 direction of what you're --

5 Q. Sure.

6 A. -- getting at?

7 Q. I just want to understand sort of

8 what -- what is observed is a bit of quiet in

9 terms of the documents that we've seen by way of

10 things that Skatte had to do after the signing of

11 the settlement agreement and the payment of the

12 initial money.

13 We don't see a lot of documents

14 concerning things that Skatte had to do under the

15 settlement agreement.

16 A. What things?

17 Q. That's what I'm asking you.

18 What things did Skatte have to do under

19 the settlement agreement after the initial

20 payment?

21

22 THE WITNESS: Again, I'm not sure what

23 you're getting at specifically. I don't -- I

24 haven't memorized the settlement agreement

25 for this, so I would need you to point me in

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 the right direction.

3 Is there any specific obligation that

4 you are referring to whether or not that we

5 reported on in the meetings with SOIK?

6

7

8

9

10 So is there anything that you recall

11 reporting to SOIK that Skatte was required to do

12 under the settlement agreement after the signing

13 of it?

14 A. I think we're going a little bit around

15 in circles here.

16 Q. Let me see if I can start -- let me see

17 if I can start with the covered parties first, and

18 then we'll return to SOIK.

19 A. Yes.

20 Q. So, after the signing of the settlement

21 agreement and the payment of the initial cash

22 payment...

23 A. Mm-hmm.

24 Q. The covered parties have to cooperate,

25 right?

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. Yes.

3 Q. They have to provide some quarterly

4 reports, correct?

5 A. Yes.

6 Q. And there may have been some payments?

7 A. Yes.

8 Q. Correct? Was there -- were there any

9 meetings where those things were reported on

10 with -- where SOIK was -- was present?

11 A. I don't have a specific recollection of

12 it, but that would have been something we reported

13 to SOIK, that we had gotten the initial cash

14 payment. That would have been reported. If we at

15 that point had received cooperation, that would

16 have been told to SOIK.

17 But, again, asking about my specific

18 recollection of it, I don't have that, five years

19 later on.

20 Q. You're guessing about what -- what

21 would have been reported?

22 A. I am giving a qualified assessment of

23 what we would naturally have told SOIK.

24 Q. You don't have any recollection that

25 you actually did?



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Q. Okay. And you're defining that period

3 as what?

4 A. As the period that's described in

5 the -- in the -- what -- discovery I believe is

6 the right word, right?

7 Q. In the topics that --

8 A. Yes.

9 Q. -- we used to help you prepare --

10 A. Yes.

11 Q. -- to be deposed --

12 A. Yes.

13 Q. -- as a representative of Skatte?

14 A. Yes.

15 Q. Okay. From roughly the beginning of

16 2019 to roughly June of 2021?

17 A. Yes.

18 Q. Okay. You're not aware of any other

19 written agendas in this form, the form set out in

20 113, or in this form, 114?

21 A. No. Then it would have been the

22 discovery material.

23 Q. Okay. Okay. Thank you.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 THE WITNESS: This is not meetings from

5 the meeting. This is in preparation of the

6 meeting.

7 BY MR. LEVY:

8 Q. Okay. So there's no summary of what

9 actually happened at the meeting?

10 A. Correct.

11 Q. Okay. Now I have it. Thank you.



A horizontal bar chart with two main sections. The top section is for 'All respondents' and the bottom section is for 'U.S. adults'. Each section contains bars for 'Men' and 'Women' across five age groups: 18-29, 30-49, 50-69, 70+, and 'Total'. The y-axis represents the percentage of respondents, ranging from 0 to 100. The bars are dark blue for men and light blue for women. In the 'All respondents' section, the bars are ordered from top to bottom: Total, Men, Women, 18-29, 30-49, 50-69, 70+. In the 'U.S. adults' section, the bars are ordered from top to bottom: Total, Men, Women, 18-29, 30-49, 50-69, 70+.

Category	Age Group	Gender	Percentage (%)
All respondents	Total	Men	95
		Women	98
	18-29	Men	92
		Women	95
	30-49	Men	90
		Women	93
	50-69	Men	88
		Women	91
	70+	Men	85
		Women	88
U.S. adults	Total	Men	92
		Women	95
	18-29	Men	89
		Women	92
	30-49	Men	87
		Women	90
	50-69	Men	85
		Women	88
	70+	Men	82
		Women	85

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists 16 categories combining age and gender. The x-axis represents the percentage, ranging from 0 to 100. The bars are colored in shades of blue and green. The data shows that a majority of respondents in all age groups and genders believe the U.S. should take action to address climate change, with the highest percentages generally found in the 18-29 age group and among females.

Age Group	Gender	Percentage
18-29	Male	92%
18-29	Female	95%
30-49	Male	90%
30-49	Female	93%
50-69	Male	85%
50-69	Female	88%
70+	Male	80%
70+	Female	83%
18-29	Male	75%
18-29	Female	78%
30-49	Male	70%
30-49	Female	73%
50-69	Male	65%
50-69	Female	68%
70+	Male	60%
70+	Female	63%
18-29	Male	55%
18-29	Female	58%
30-49	Male	50%
30-49	Female	53%
50-69	Male	45%
50-69	Female	48%
70+	Male	40%
70+	Female	43%
18-29	Male	35%
18-29	Female	38%
30-49	Male	30%
30-49	Female	33%
50-69	Male	25%
50-69	Female	28%
70+	Male	20%
70+	Female	23%

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21 MR. LEVY: One fifteen.

22 (Email chain was marked Skatte Exhibit

23 115, for identification.)

[REDACTED]

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 Q. Okay. Esbin is the deputy director,

14 chief of staff. Is that an okay translation of

15 the Danish for -- for his title?

16 A. Well formally deputy director, it's a

17 director because -- well, just running you through

18 the hierarchy, so Merete Agergaard is director

19 general; Steen would be assistant director

20 general; I would be a director; Esbin the same.

21 That's the -- in my signature, that's

22 what I would write, if I wrote my signature in

23 English.

24 Q. Very good. Thank you.

25 And he writes to Cecily, Cecily?

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

[REDACTED]

5 Q. About "gladly sending the attached,"

6 and then he appears to solicit from you your final

7 comments. And then there appears to be a press

8 release attached.

9 Is this either the final or something

10 close to the final?

11 A. This would be something close to the

12 final.

13 Q. Is it possible that it is the final?

14 A. It is possible that it is the final.

15 Q. Okay, so it's either close or actually

16 the final?

17 A. Yes.

18 Q. Okay. We had some difficulty locating

19 the actual final. So that's why I wanted to make

20 sure --

21 A. Yes.

22 Q. -- that we are -- we are at least in

23 the ballpark.

24 A. Yeah.

25 Q. Okay.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. I'm saying that with --

[REDACTED]

[REDACTED]

5 THE INTERPRETER: "Reservations".

6 THE WITNESS: Again, I haven't done an

7 exact side by side of the exact final one,

8 but presumably it is.

9 BY MR. LEVY:

10 Q. Okay. Well, it was -- it was -- do you

11 remember it being issued on September 25th?

12 A. In or around September 25th.

13 Q. Yeah. An email --

14 A. I think is -- is correct.

15 Q. An email was sent on the morning of

16 September 25th.

17 A. Yeah.

18 Q. So does that help you remember -- does

19 that -- does that help you remember with

20 greater -- greater clarity that this is either the

21 final or close to final?

22 A. Well, I haven't read through the text.

23 I don't remember the final text. So again to be

24 certain of that, I would --

25 Q. Okay.



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. -- have to see them side by side. So

3 that's what my reservation concerns.

4 Q. Fair enough. Thank you. Does -- does

5 this help you -- does this refresh your

6 recollection about the criticisms -- withdrawn.

7 Does this refresh your recollection

8 about the criticisms that were out in the media

9 that generated the need perceived by Skatte to

10 issue this press release?

11 A. Yes, it does.

12 Q. Okay.

13 A. I haven't read through the whole thing

14 yet, but, just reading through the first

15 paragraph, and it's along the lines that what I

16 said before. It's talking about large discounts

17 that we gave to the settling parties, that we had

18 promised them criminal immunity.

19 Q. Let me direct your attention to the --

20 to the Danish --

21 A. Mm-hmm.

22 Q. -- for one second.

23 A. Mm-hmm.

24 Q. The third line down in the Danish of

25 the first substantive paragraph that refers to

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 "DV2"?

3 A. Yes.

4 Q. There's a word -- and I'm going to

5 spell it for the reporter: S-t-r-a-f-f-r-i-h-e-d,

6 and that has been translated as "impunity".

7 A. I don't know the word "impunity".

8 Q. Okay, I'm -- that's exactly what I

9 wanted to get at. So I want -- I just want you to

10 explain what the Danish concept that's captured in

11 the Danish is referring to.

12 A. It's referring to -- well, what is

13 alleged by the media is that Skatte has promised

14 immunity from criminal liability and large

15 discounts.

16 Q. And that was not true?

17 A. That was not true? No.

18 Q. From your perspective, that's not true?

19 A. No.

20 Q. This is not, as you understand it, what

21 the settlement agreement does?

22 A. No, correct.

23 Q. And -- and the purpose of this -- one

24 of the purposes of the press release is to clarify

25 what the relationship between the settlement and

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 the criminal case is, correct?

3 A. One of the -- yes, one of the purposes

4 of its righting and obvious wrong as we saw the

5 stories, the medias were pushing at the time.

6 Q. And do you remember whether this press

7 release was also -- withdrawn.

8 Do you remember whether this press

9 release was provided in draft form to counsel for

10 the covered parties?

11 A. I believe all press releases were. All

12 communications were, as I said earlier, was

13 provided to the settling parties' counsel.

14 Q. It doesn't say anything about 8(f),

15 does it?

16 A. Then I need to read through the whole

17 thing.

18 Q. Fair enough.

19 A. Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 Q. Okay. The -- the press release doesn't

7 say that in the settlement agreement Skatte

8 committed to making certain things -- withdrawn.

9 It doesn't say in the press release

10 that pursuant to the settlement agreement Skatte

11 had committed to communicating certain things in a

12 certain way to SOIK?

13 A. In this press release?

14 Q. Yes.

15 A. No, that wouldn't have been the

16 context -- wouldn't have made sense in the

17 context.

18 This is rebutting critique from the

19 media about the settlement. So that's what we

20 argued against. That was the -- the main purpose

21 of this press release, was saying, so the media is

22 saying this is not true because of this. They're

23 saying number two, this, it's not true because of

24 this.

25 So that's how the whole press release



<div>Page 257</div> <div>1 GRY AHLEFELD-ENGEL 30(b)(6)</div> <div>2 is constructed or designed.</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>
<div>Page 258</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>

[illegible]



Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	85	15
30-49	85	15
50-69	85	15
70+	85	15

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

16 One of the obligations of the -- set
17 out in the letter agreement was to provide
18 quarterly reports. Do you remember that?
19 A. Yes, I remember.
20 Q. Do you want to look at the --
21 A. Yeah.
22 Q. -- the provision of this -- of the
23 letter agreement that discusses that?
24 Have we marked the letter agreement?
25 A. I think we did.

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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 Q. Okay. It's 109.
3 A. Yes, I have it in front of me.
4 Q. And it's paragraph four.
5 (Witness reviews document.)
6 A. I've read through it.
7 Q. Did Skatte receive the quarterly
8 reports?
9 A. I've been made aware that we did
10 receive quarterly reports up until a point, I
11 believe.
12 Q. And when you say you've been made
13 aware.
14 A. It's not reports that has gone directly
15 to me. It's gone do my --
16 Q. Gone to counsel.
17 A. Gone to counsel, and then again
18 preparing for this, I would -- I was provided that
19 knowledge.
20 Q. And -- and did -- did -- did you --
21 have you seen the quarterly reports?
22 A. No.
23 Q. Neither at the time that they were
24 generated, nor in prep -- withdrawn.
25 You didn't see them at the time they --

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 they were received?
3 A. No.
4 Q. Did anyone else in Skatte receive them
5 at the time that they were -- that they were
6 provided?
7 A. I believe no.
8 Q. They were only provided to Skatte's
9 counsel?
10 A. Yes.
11 Q. And do you know what Skatte's counsel
12 did with them?

[REDACTED]

22 THE WITNESS: Yeah, no.
23 BY MR. LEVY:
24 Q. Do you remember having occasion to have
25 a discussion within Skatte about the content of

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists 20 different age and gender categories. The x-axis represents the percentage, ranging from 0 to 100. The bars are color-coded by age group: 18-29 (dark blue), 30-49 (medium blue), 50-69 (light blue), and 70+ (very light blue). The chart shows that younger age groups are more likely to believe that the U.S. should take action to address climate change, with the 18-29 group showing the highest percentage of respondents (around 85%) believing that the U.S. should take action. The 70+ group shows the lowest percentage of respondents (around 35%) believing that the U.S. should take action. The chart also shows that men are more likely than women to believe that the U.S. should take action to address climate change, with men showing a higher percentage of respondents (around 75%) believing that the U.S. should take action compared to women (around 65%).

Age Group	Gender	Percentage (%)
18-29	Male	85
18-29	Female	80
30-49	Male	75
30-49	Female	70
50-69	Male	65
50-69	Female	60
70+	Male	55
70+	Female	50
18-29	Male	85
18-29	Female	80
30-49	Male	75
30-49	Female	70
50-69	Male	65
50-69	Female	60
70+	Male	55
70+	Female	50
18-29	Male	85
18-29	Female	80
30-49	Male	75
30-49	Female	70
50-69	Male	65
50-69	Female	60
70+	Male	55
70+	Female	50
18-29	Male	85
18-29	Female	80
30-49	Male	75
30-49	Female	70
50-69	Male	65
50-69	Female	60
70+	Male	55
70+	Female	50

<p>[REDACTED]</p>	<p style="text-align: right;">Page 283</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>3 THE LEGAL VIDEO SPECIALIST: Thank you.</p> <p>4 The time is 5:11 p.m. That concludes today's</p> <p>5 deposition. We are off the record.</p> <p>6 (Whereupon at 5:11 p.m. the videotaped</p> <p>7 30(b)(6) deposition of Skatteforvaltningen by</p> <p>8 Gry Ahlefeld-Engel stood in recess until</p> <p>9 Friday, May 31, 2024 at 9:00 a.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>[REDACTED]</p>	<p style="text-align: right;">Page 284</p> <p>1 GRY AHLEFELD-ENGEL 30 (b) (6)</p> <p>2 I N D E X</p> <p>3 30 (b) (6) DEPOSITION OF GRY AHLEFELD-ENGEL</p> <p>4</p> <p>5 EXAMINATION BY: PAGE:</p> <p>6 Mr. Levy 11</p> <p>7</p> <p>8 INDEX OF DEPOSITION EXHIBITS:</p> <p>9 SKATTE EXHIBITS: PAGE:</p> <p>10 Skatte Exhibit 100 Email chain 24</p> <p>11 Skatte Exhibit 101 Email chain 54</p> <p>12 Skatte Exhibit 102 Email chain 84</p> <p>13 Skatte Exhibit 103 Email chain 98</p> <p>14 Skatte Exhibit 104 Settlement agreement 98</p> <p>15 Skatte Exhibit 105 Email chain 135</p> <p>16 Skatte Exhibit 106 Press release 140</p> <p>17 Skatte Exhibit 107 Email chain 163</p> <p>18 Skatte Exhibit 108 Email chain 174</p> <p>19 Skatte Exhibit 109 Letter agreement 178</p> <p>20 Skatte Exhibit 110 Email chain and 180</p> <p>21 attachments</p> <p>22 Skatte Exhibit 111 Skatte's pleading 187</p> <p>23 Skatte Exhibit 112 Email chain 201</p> <p>24 Skatte Exhibit 113 Tentative meeting</p> <p>25 agenda 210</p>

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285-288

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<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 INDEX OF DEPOSITION EXHIBITS CONTINUED:</p> <p>3 SKATTE EXHIBITS: PAGE:</p> <p>4 Skatte Exhibit 114 Annotated agenda 225</p> <p>5 Skatte Exhibit 115 Email chain 249</p> <p>6 Skatte Exhibit 116 Email chain 261</p> <p>7 Skatte Exhibit 117 Email chain 272</p> <p>8 Skatte Exhibit 118 Email chain 279</p> <p>9 Skatte Exhibit 119 Email chain 279</p> <p>10</p> <p>11 (Exhibits attached to original transcript.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 ACKNOWLEDGEMENT OF WITNESS</p> <p>3 I, GRY AHLEFELD-ENGEL, do hereby</p> <p>4 acknowledge that I have read and examined the</p> <p>5 foregoing testimony, and the same is a true,</p> <p>6 correct and complete transcription of the</p> <p>7 testimony given by me, and any corrections appear</p> <p>8 on the attached Errata sheet signed by me.</p> <p>9</p> <p>10 (DATE) (SIGNATURE)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>																																																																																																				
<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 ERRATA SHEET FOR THE TRANSCRIPT OF:</p> <p>3 Case Name: Matthew Stein and Jerome Lhote vs.</p> <p>4 Skatteforvaltningen.</p> <p>5 Dep. Date: May 30, 2024</p> <p>6 Deponent: 30(b)(6) of Skatteforvaltningen by Gry</p> <p>7 Ahlefeld-Engel</p> <p>8</p> <p>9 CORRECTIONS:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Pg.</th> <th>Ln.</th> <th>Now Reads</th> <th>Should Read</th> <th>Reason</th> </tr> </thead> <tbody> <tr><td>7</td><td></td><td></td><td></td><td></td></tr> <tr><td>8</td><td></td><td></td><td></td><td></td></tr> <tr><td>9</td><td></td><td></td><td></td><td></td></tr> <tr><td>10</td><td></td><td></td><td></td><td></td></tr> <tr><td>11</td><td></td><td></td><td></td><td></td></tr> <tr><td>12</td><td></td><td></td><td></td><td></td></tr> <tr><td>13</td><td></td><td></td><td></td><td></td></tr> <tr><td>14</td><td></td><td></td><td></td><td></td></tr> <tr><td>15</td><td></td><td></td><td></td><td></td></tr> <tr><td>16</td><td></td><td></td><td></td><td></td></tr> <tr><td>17</td><td></td><td></td><td></td><td></td></tr> <tr><td>18</td><td></td><td></td><td></td><td></td></tr> <tr><td>19</td><td></td><td></td><td></td><td></td></tr> <tr><td>20</td><td></td><td></td><td></td><td></td></tr> <tr><td>21</td><td></td><td></td><td></td><td></td></tr> <tr><td>22</td><td></td><td></td><td></td><td></td></tr> <tr><td>23</td><td></td><td></td><td></td><td></td></tr> <tr><td>24</td><td></td><td></td><td></td><td></td></tr> <tr><td>25</td><td></td><td></td><td></td><td></td></tr> </tbody> </table> <p>19 SUBSCRIBED AND SWORN BEFORE ME</p> <p>20 THIS _____ DAY OF _____, 2024</p> <p>21 _____</p> <p>22 (Notary Public)</p> <p>23 MY COMMISSION EXPIRES: _____</p> <p>24</p> <p>25</p>	Pg.	Ln.	Now Reads	Should Read	Reason	7					8					9					10					11					12					13					14					15					16					17					18					19					20					21					22					23					24					25					<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 C E R T I F I C A T E</p> <p>3 STATE OF NEW YORK)</p> <p>4 : Ss.</p> <p>5 COUNTY OF NEW YORK)</p> <p>6 I, Kim M. Brantley, Shorthand</p> <p>7 Reporter, and Notary Public within and for the</p> <p>8 State of New York, do hereby certify:</p> <p>9 That GRY AHLEFELD-ENGEL, the witness</p> <p>10 whose deposition is hereinbefore set forth, was</p> <p>11 duly sworn by me and that such deposition is a</p> <p>12 true record of the testimony given by the witness.</p> <p>13 I further certify that I am not related</p> <p>14 to any of the parties to this action by blood or</p> <p>15 marriage, and that I am in no way interested in</p> <p>16 the outcome of this matter.</p> <p>17 IN WITNESS WHEREOF, I have hereunto set</p> <p>18 my hand this 2nd day of June, 2024.</p> <p>19 <i>Kim M. Brantley</i></p> <p>20 Kim M. Brantley</p> <p>21</p> <p>22</p> <p>23</p> <p>24 My Commission expires May 31, 2026.</p> <p>25</p>
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GRY AHLEFELD-ENGEL Vol. 2 30(b)(6)
STEIN and LHOTE vs SKATTEFORVALTNINGEN

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<p>1 UNITED STATES DISTRICT COURT</p> <p>2 SOUTHERN DISTRICT OF NEW YORK</p> <p>3 - - - - -)</p> <p>4 MATTHEW STEIN and JEROME LHOTE,)</p> <p>5 Plaintiffs,) Case No.:</p> <p>6 v.) 23 Civ. (NRB)</p> <p>7 SKATTEFORVALTNINGEN,) Vol. 2</p> <p>8 Defendant.)</p> <p>9 and)</p> <p>10 LUKE MCGEE,)</p> <p>11 Nominal Defendant.)</p> <p>12 - - - - -)</p> <p>13 SKATTEFORVALTNINGEN,)</p> <p>14 Counterclaim Plaintiff,)</p> <p>15 v.)</p> <p>16 MATTHEW STEIN, JEROME LHOTE,)</p> <p>17 and LUKE MCGEE,)</p> <p>18 Counterclaim Defendants.)</p> <p>19 - - - - -)</p> <p>20 CONTINUED VIDEOTAPED 30(b)(6) DEPOSITION OF</p> <p>21 SKATTEFORVALTNINGEN by GRY AHLEFELD-ENGEL</p> <p>22</p> <p>23 Reported by: Kim M. Brantley</p> <p>24</p> <p>25 Job No: J11294061</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 APPEARANCES:</p> <p>3 For Plaintiffs/Counterclaim Defendants</p> <p>4 Matthew Stein and Jerome Lhote:</p> <p>5 MCKOOL SMITH, PC</p> <p>6 1301 Avenue of the Americas 32nd FL</p> <p>7 New York, New York 10019</p> <p>8 (212) 402-9412</p> <p>9 Email: dlevy@mckoolsmith.com</p> <p>10 ovisconti@mckoolsmith.com</p> <p>11 BY: DANIEL LEVY, ESQUIRE</p> <p>12 OLIVIA VISCONTI, ESQUIRE</p> <p>13</p> <p>14 For Defendant/Counterclaim Plaintiff</p> <p>15 Skatteforvaltningen:</p> <p>16 HUGHES HUBBARD & REED, LLP</p> <p>17 One Battery Park Plaza</p> <p>18 New York, New York 10004</p> <p>19 (212) 837-6843</p> <p>20 Email: marc.weinstein@hugheshubbard.com</p> <p>21 neil.oxford@hugheshubbard.com</p> <p>22 kiran.rosenkilde@hugheshubbard.com</p> <p>23 BY: MARC A. WEINSTEIN, ESQUIRE</p> <p>24 NEIL J. OXFORD, ESQUIRE</p> <p>25 KIRAN ROSENKILDE, ESQUIRE</p>
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<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Friday, May 31, 2024</p> <p>3 Time: 9:13 a.m.</p> <p>4 Continued videotaped 30(b)(6) deposition of</p> <p>5 SKATTEFORVALTNINGEN, by GRY AHLEFELD-ENGEL, held</p> <p>6 at Hughes Hubbard & Reed, One Battery Park Plaza,</p> <p>7 New York, New York, before Kim M. Brantley, Court</p> <p>8 Reporter and Notary Public of the State of New</p> <p>9 York.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 APPEARANCES CONTINUED:</p> <p>3 For Nominal Defendant/Counterclaim Defendant</p> <p>4 Luke McGee:</p> <p>5 NELSON MULLINS RILEY & SCARBOROUGH, LLP</p> <p>6 2 S Biscayne Blvd. - 21st Floor</p> <p>7 Miami, Florida 33131</p> <p>8 (305) 373-9400</p> <p>9 Email: dan.newman@nelsonmullins.com</p> <p>10 justin.kaplan@nelsonmullins.com</p> <p>11 edgar.neely@nelsonmullins.com</p> <p>12 BY: DANIEL NEWMAN, ESQUIRE</p> <p>13 JUSTIN B. KAPLAN, ESQUIRE</p> <p>14 EDGAR A. NEELY, IV, ESQUIRE (Georgia)</p> <p>15 (Attending via Zoom)</p> <p>16 ALSO PRESENT:</p> <p>17 Counsel from Kammeradvokaten (Denmark)</p> <p>18 KATRINE HENCKEL HARLOFF, ESQUIRE</p> <p>19 ANNE CHRISTINE K. EGHOLM, ESQUIRE</p> <p>20 MIKKEL D. FANO, ESQUIRE</p> <p>21 (Attending via Zoom)</p> <p>22 and</p> <p>23 MATTHEW STEIN, Plaintiff</p> <p>24 JEROME LHOTE, Plaintiff</p> <p>25 (Both attending via Zoom)</p>

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 APPEARANCES CONTINUED:

3 ANETTE CHRISTENSEN, Interpreter of Danish

4 (Appearing via Zoom)

5 and

6 CHARLES BOWMAN, Legal Video Specialist

7 Esquire Deposition Solutions

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 P R O C E E D I N G S

3 THE LEGAL VIDEO SPECIALIST: We are now

4 on the record. The time is 9:13 a.m. on May

5 31st, 2024.

6 This is the continuation of the

7 videotaped deposition of Gry Ahlefeld-Engel,

8 taken in the matter of Stein and Lhote v.

9 Skatteforvaltningen, in the United States

10 District Court, Southern District, New York.

11 My name is Charlie Bowman, and I'm your

12 videographer today. The court reporter is

13 Kim Brantley. We are representing Esquire

14 Deposition Solutions.

15 Would counsel please introduce

16 yourselves and affiliations, and then the

17 witness will be sworn in.

18 MR. LEVY: Good morning. Daniel Levy,

19 and Olivia Visconti from McKool Smith for Mr.

20 Stein and Mr. Lhote.

21 MR. NEWMAN: Dan Newman from Nelson

22 Mullins on behalf of Luke McGee.

23 MR. KAPLAN: Justin Kaplan from Nelson

24 Mullins on behalf of Luke McGee.

25 MR. WEINSTEIN: Mark Weinstein, Hughes

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Hubbard Reed, for Skatte.

3 MS. HARLOFF: Katrine Henckel Harloff,

4 for Kammeradvocaten, Skatte.

5 MS. EGHOLM: Anne Kristine Egholm,

6 Kammeradvokaten, Skatte.

7 MR. ROSENKILDE: Kiran Rosenkilde,

8 Hughes Hubbard & Reed, for Skatte.

9 MR. LEVY: Can I ask the videographer

10 to identify those who are present by Zoom.

11 THE LEGAL VIDEO SPECIALIST: Yes, sir.

12 Anette Christensen, Edgar Neely --

13 THE INTERPRETER: Yes.

14 THE LEGAL VIDEO SPECIALIST: -- Edgar

15 Neely, Matt Stein, Mikkel D. Fano.

16 MR. LEVY: There's no one else?

17 THE LEGAL VIDEO SPECIALIST: That's it.

18 MR. LEVY: Okay, very good. Thank you.

19 And Mr. Neely is from Nelson Mullins on

20 behalf of Mr. McGee.

21 ANETTE CHRISTENSEN,

22 called as the official interpreter of Danish, did

23 swear to translate the questions in this case from

24 English to Danish, and the answers from Danish to

25 English, to the best of her ability.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 GRY AHLEFELD-ENGEL,

6 called as a witness by Counsel for the Plaintiffs,

7 and, after having been first duly sworn by the

8 Notary Public, was examined and testified as

9 follows:

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Age Group	Percentage of Respondents
18-29	95%
30-49	90%
50-64	85%
65+	85%

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>1 GRY AHLEFELD-ENGEL 30(b)(6) Page 302</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 Q. Let me ask you to put in front of you</p> <p>7 Exhibit 118, which we marked yesterday. You have</p> <p>8 it --</p> <p>9 A. I do.</p> <p>10 [REDACTED]</p> <p>11 Do you recognize this?</p> <p>12 A. I do.</p> <p>13 Q. What is this?</p> <p>14 A. Well, the front page of it is a email</p> <p>15 from a case worker in SOIK to Camilla Lindrum Bay</p> <p>16 at Skatte with an attached request for information</p> <p>17 from Skatte about the settlement agreement. And</p> <p>18 then it's an email continuation where Camilla</p> <p>19 sends the request, forwards the request to myself</p> <p>20 and Bettina saying that, "We got a number of</p> <p>21 questions from SOIK relating to the settlement."</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p>



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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 Did you know in -- did Skatte know in
10 advance of receiving this letter that such a
11 letter was going to be sent?
12 A. No, not to my recollection we didn't.
13 We had no knowledge.
14 Q. It came -- it came to Skatte without
15 Skatte's having any advanced notice?
16 A. Not that I recall.
17 Q. You're here as -- on behalf of Skatte?
18 A. Yeah, I know.
19 Q. So Skatte has no information?
20 A. I have no information --
21 Q. -- to that effect?
22 A. -- and such a call would have been made
23 to me if it was advised in advance, and I don't
24 have the recollection of such a call being made to
25 me.

[illegible]

Age Group	Percentage of Respondents
18-29	90%
30-49	85%
50-64	80%
65+	60%

1 GRY AHLEFELD-ENGEL 30(b)(6) Page 308

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 Q. Okay. She indicates in -- in substance

15 that "SOIK is presenting a great number of

16 questions about the settlement," and then she

17 indicates in substance that she believes that,

18 "We cannot/must not answer because of the

19 settlement's confidentiality clauses."

20 Do you remember receiving this?

21 A. Yes.

22 Q. Did you have a reaction to her -- her

23 indication that she believed that we cannot/must

24 not answer?

25 A. No. I don't recall. I just recall

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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 putting the process in motion of having the
 3 questions answered to the extent that we could.
 4 But that wouldn't have been something we did on
 5 our own. That would be, you know, in dialogue
 6 with counsel, with our counsel how to answer the
 7 questions.
 8 Q. And -- and when you say -- without
 9 knowing the nature of your consultations, when you
 10 say you consulted with counsel, which counsel?
 11 A. Kammeradvokaten in Denmark.
 12 Q. Okay. And did your -- did you consult
 13 with your U.S. counsel? Again, I don't want to
 14 know the nature of the consultation; just trying
 15 to find out.
 16 A. The process when I consult with
 17 counsel, I consult with Kammeradvokaten, and any
 18 further consulting would be through
 19 Kammeradvokaten and any of our lawyers.
 20 Q. Typically you would not consult
 21 directly with --
 22 A. No.
 23 Q. -- your U.S. counsel?
 24 A. No. I consult with Kammeradvokaten.

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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 Q. The translation from Danish to English
 6 that we've been provided -- and again I don't know
 7 if it's accurate -- says, "I believe we
 8 cannot/must not answer." And I just want to make
 9 sure that you can look at the Danish and -- and
 10 give me a sense of whether that is a fair and --
 11 fair -- fair translation. It's a formulation that
 12 people use in English, and I just want to make
 13 sure that it captures what is set out in the
 14 Danish.
 15 [REDACTED]
 16 THE WITNESS: If -- if I were to
 17 translate it, I would say that what she's
 18 writing is that, "A number of the questions I
 19 don't think" -- referring to her -- "can be
 20 answered or we are allowed to answer under
 21 the clauses of the settlement."



<div>[REDACTED]</div>	<div>Page 315</div> <div>1 GRY AHLEFELD-ENGEL 30(b)(6)</div> <div>[REDACTED]</div> <div>15 (Email chain was marked Skatte Exhibit</div> <div>16 120, for identification.)</div> <div>[REDACTED]</div> <div>22 Q. Okay. Did Skatte have any concerns</div> <div>23 about potential negative implications that might</div> <div>24 result from responding to SOIK's inquiry?</div> <div>[REDACTED]</div>
<div>[REDACTED]</div>	<div>Page 316</div> <div>1 GRY AHLEFELD-ENGEL 30(b)(6)</div> <div>[REDACTED]</div> <div>18 Q. Okay. Why don't you look at Mr.</div> <div>19 Bechmann's email dated January 14th, 2021.</div> <div>20 A. Yes.</div> <div>21 Q. In it he refers to some provisions of</div> <div>22 the -- what he calls the civil procedure code.</div> <div>23 A. The Danish Administrations Act.</div> <div>24 Q. Are you familiar with those provisions?</div> <div>25 A. Yes.</div>

GRY AHLEFELD-ENGEL Vol. 2 30(b)(6)
STEIN and LHOTE vs SKATTEFORVALTNINGEN

May 31, 2024
317-320

<p style="text-align: right;">Page 317</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Q. What generally is -- is -- is the</p> <p>3 concern being articulated by Mr. Bechmann?</p> <p>4 A. That when we send these answers to --</p> <p>5 or our answers to SOIK, they will be made</p> <p>6 available to any indicted persons in the case and</p> <p>7 will not be able to kept -- be kept confidential</p> <p>8 unless such a provision being imposed on the</p> <p>9 documents by way of section 729 of the Danish</p> <p>10 Administrations Act.</p> <p>11 Q. And do you know what -- what</p> <p>12 limitations can be imposed under that provision?</p> <p>13 A. I don't recall it that well, that</p> <p>14 provisions, so I would have to have it in front of</p> <p>15 me.</p> <p>16 Q. Okay.</p> <p>17 A. It's a very extensive binder of law.</p> <p>18 Q. And -- and you referred to it as the</p> <p>19 Danish Administrations Code?</p> <p>20 A. Danish Administrations Act. That's</p> <p>21 what it's translated to directly.</p> <p>22 Q. Is it the same -- is it known as the</p> <p>23 Administration of Justice Act?</p> <p>24 A. I only know it as the Danish</p> <p>25 Administrations Act I think it's called.</p>	<p style="text-align: right;">Page 319</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 just that it's "the" case.</p> <p>3 So, when we allow information to go</p> <p>4 out, we have to be aware that we lose control of</p> <p>5 the information, and we don't know who is on the</p> <p>6 other side of that information. We don't know if</p> <p>7 there are a hundred people being charged, two</p> <p>8 people being charged, ten people being charged.</p> <p>9 Their defense lawyers would have access to the</p> <p>10 information that we're sending out.</p> <p>11 So the concern is, that being a fact,</p> <p>12 are we going to be in breach of the</p> <p>13 confidentiality clause of the -- of the</p> <p>14 settlement.</p> <p>15 Q. This is an inquiry from a component of</p> <p>16 the Danish government, correct?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. Was there any constraint in the</p> <p>19 settlement agreement about responding to</p> <p>20 governmental inquiries?</p> <p>21 A. But that's the whole point. We can't</p> <p>22 control that it only goes to the -- to the -- to</p> <p>23 SOIK. Because when it's within SOIK's sphere,</p> <p>24 they -- and if there's a case, which they say that</p> <p>25 there is, then it will go into that case file.</p>
<p style="text-align: right;">Page 318</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Q. Okay. Very good. Thank you.</p> <p>3 And then in the English, around the</p> <p>4 middle, he begins, "The information will thereby</p> <p>5 come to the knowledge of the accused/defense and</p> <p>6 will also be able to be presented during the main</p> <p>7 hearings in the upcoming criminal cases."</p> <p>8 A. Yes.</p> <p>9 Q. And then he continues about, "unless a</p> <p>10 contrary ruling is -- is issued."</p> <p>11 A. Mm-hmm.</p> <p>12 Q. Does Skatte know what Mr. Bechmann was</p> <p>13 referring to when he -- he referred to "upcoming</p> <p>14 criminal cases"?</p> <p>15 A. I believe it's a generalization, any</p> <p>16 criminal casing -- cases coming up from our report</p> <p>17 to the police.</p> <p>18 Q. And what was Skatte's knowledge of what</p> <p>19 cases might be upcoming at this point in January</p> <p>20 of 2021?</p> <p>21 A. Just what they're saying in the letter,</p> <p>22 that they're investigating "the" case. That's the</p> <p>23 whole point of their concern. They're</p> <p>24 investigating "the" case. We don't know what</p> <p>25 specific part of the case this is pertaining to,</p>	<p style="text-align: right;">Page 320</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 That's -- that's how it -- that's how the rules</p> <p>3 are.</p> <p>4 Put on the case, and everybody who is</p> <p>5 involved in that case -- the prosecutors within</p> <p>6 SOIK, but also defense lawyers if there are in</p> <p>7 fact such defense lawyers, people who are charged,</p> <p>8 if there are such persons -- they have access to</p> <p>9 that same information.</p> <p>10 Q. So --</p> <p>11 A. So we don't just give the information</p> <p>12 to SOIK. We are aware that we are giving the</p> <p>13 information potentially to a large number of</p> <p>14 people.</p> <p>15 Q. And that was the nature of the concern</p> <p>16 about breaching the confidentiality clause --</p> <p>17 A. That's how I'm --</p> <p>18 Q. Let me just finish.</p> <p>19 A. Sorry.</p> <p>20 Q. Yep -- responding to an inquiry to</p> <p>21 SOIK, and then the concern was that it may become</p> <p>22 available thereafter. That was -- that was the</p> <p>23 concern about the breach that generated -- that</p> <p>24 was the set of facts that concerned -- that</p> <p>25 generated the concern about the breach of the</p>

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 confidentiality clause?

3 A. That's what's expressed --

4 [REDACTED]

5 THE WITNESS: -- in that sentence that

6 you referred to from Bechmann, Steen

7 Bechmann.

8 BY MR. LEVY:

9 Q. Does he make reference, as far as you

10 understand it, to the confidentiality clause?

11 A. No, but I remember the discussions we

12 had about this concern.

13 Q. Tell me about those discussions.

14 A. But that is what I just told you; that

15 we were aware that when we would give off

16 information to SOIK, it would not just -- it would

17 be out of our control, the information, and the

18 information would potentially be disseminated to

19 far more people than just SOIK.

20 Q. And -- and Skatte was worried that if

21 SOIK was required to disseminate the information,

22 that could be a breach of the confidentiality

23 clause on the part of Skatte?

24 A. That's how I recall it, yes.

25 Q. Did you -- you discussed that with Mr.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Bechmann?

3 A. I discussed the -- I discussed the

4 concern that he is referring to here, that that is

5 a fact, that when you give off information in this

6 regard, or in this context, that is what happens.

7 Q. And that that dissemination by SOIK of

8 the information could result in a breach by

9 Skatte --

10 A. Yes.

11 Q. -- of the confidentiality clause?

12 [REDACTED]

13 [REDACTED]

14 Q. That was the nature of your discussion

15 with Mr. Bechmann?

16 A. Our worries was that we would breach,

17 we would be in breach if the information was out

18 of our control and disseminated to a larger amount

19 of people.

20 Q. As a result of a response to a

21 governmental inquiry?

22 A. Yes.

23 [REDACTED]

24 With -- with -- other than that

25 discussion with Mr. Bechmann, did you discuss with

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 him the nature of the -- anything else relating to

3 the request from SOIK?

4 A. My recollection is that we of course

5 discussed the nature of our answers, but nothing

6 more than that we had again a normal process over

7 the drafting of the answers and -- and what they

8 needed to contain, what is nature of the -- what

9 is -- what are we being asked, and are we

10 responding to that properly.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED]

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22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 Q. I'm going to show you what I'm going to

7 ask the reporter to mark as Exhibit 121.

8 (Answers were marked Skatte Exhibit

9 121, for identification.)

10 THE WITNESS: Thank you.

11 (Witness reviews document.)

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 Q. Have you now had a moment to review the

5 answers of the questions that are set out in the

6 last pages of Exhibit 121?

7 A. I have.

8 Q. Okay. So let me see if I can ask you

9 the general question again, and then maybe we can

10 go into some of the more specifics.

11 Having now reviewed the answers, is

12 there any -- anything specific about the answers

13 that was a concern of Skatte's that might result

14 in a breach of the settlement agreement by

15 responding to a governmental inquiry from

16 Skatte -- from SOIK?

18 THE WITNESS: But not just a concern
19 that responding to a -- to a governmental
20 institution. The concern again was not the
21 governmental institution. The concern was
22 everybody other than the government or SOIK.
23 That's the concern.

24 It's not SOIK in itself. It's who it
25 will be disseminated to by SOIK as part of

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 their case, which we have no insight into.

3 So we don't know who is on the other side.

4 Does it make sense? So SOIK in itself

5 is not the problem. They're -- they're

6 asking us to answer some questions. We can

7 answer that. The concern is who else will

8 have access to those answers, because we

9 don't know who's on the other side of their

10 case. We don't know if it's 200 defense

11 lawyers, 200 charged people, or one, or any.

12 So that's the concern.

13 The concern is not answering SOIK. The
14 concern is that answer being out of our
15 control when given to SOIK to a number of
16 other people --

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18 Q. But the --

19 A. -- potentially.

20 Q. But the concern is that disclosure by
21 SOIK to some unidentified set of people could be a
22 breach of the confidentiality provisions of the
23 settlement agreement.

24 Is that your testimony?

25 A. Correct.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

Age Group	Should Take Action	Should Not Take Action
18-29	95%	5%
30-49	95%	5%
50-69	95%	5%
70+	95%	5%

24 Q. You -- you've -- you've testified that
25 Skatte was concerned about a possible breach of



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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 the confidentiality agreement if it responded to
3 these inquiries because the information may be
4 disclosed by SOIK later on.
5 Do I have it correct?
6 A. As a general concern, yes.
7 Q. When you say "as a general concern,"
8 what -- what do you mean?
9 A. We haven't done into the specifics. So
10 I'm saying the concern was in general we had -- we
11 needed to be aware that we were not just giving
12 the information to SOIK. We were potentially
13 disclosing the information to a number of people
14 on the other side.
15 Q. And that that could be a breach of the
16 settlement agreement by Skatte?
17 A. To certain terms -- or to certain
18 information about the settlement, yes.
19 Q. Was there also a concern on the part of
20 Skatte about simply the other people having the
21 information from SOIK, not -- and not that it
22 might be a breach of the settlement agreement, but
23 simply they would have information that you didn't
24 want them to have?
25 A. Why would we have such a -- such a

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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 concern?
3 I mean, we have in general the more --
4 and now I'm not sure -- I'm not sure I understand
5 your question. What would our concern be towards?
6 Q. Did Skatte not want some unidentified
7 set of people to know the information set out in
8 the answers?
9 A. I don't think we had that kind of
10 concern.
11 Q. So the only concern about -- about
12 responding was that it might be a breach of the
13 settlement agreement?
14 A. Yes.
15 Q. Thank you.

[illegible][illegible]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Q. And Ms. Spang writes to Mr. Bechmann

3 and to you, and in substance Ms. Spang indicates

4 that, "Skatte has now gotten back to the response

5 and sent them on Monday, see attached, and SOIK

6 now wants to be provided the entire settlement

7 agreement."

8 Do you remember that?

9 [REDACTED]

10 A. Yes, I see what it says.

11 Q. Did -- did Skatte provide the

12 settlement agreement to SOIK?

13 A. No.

14 Q. At this time?

15 A. Correct.

16 Q. In response to this request?

17 A. Correct.

18 Q. And at any other time?

19 A. I don't believe we provided it to SOIK

20 before it was made public in the court docket

21 regarding this case.

22 Q. And -- and did SOIK ask for it at that

23 point?

24 A. They did.

25 Q. And did Skatte provide it at that

Page 338

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 point?

3 A. No.

4 Q. Why not?

5 A. Because we again were not -- we were

6 worried about who would -- the concern was we

7 wouldn't just be giving it to SOIK. We would be

8 giving it to a number of people. And also I

9 believe we were not obligated to, so we decided

10 not to.

11 Q. And what were the concerns -- despite

12 not being obligated to, why didn't Skatte provide

13 it to SOIK?

14 A. I believe I've answered that.

15 There was a concern that we would

16 disseminate it to a larger audience of people than

17 just to SOIK. We had provided SOIK with

18 information. SOIK didn't contextualize to us to

19 what extent it was to be used or where it was to

20 be used. So we decided not to.

21 Q. Even though it had become substantially

22 public at that point?

23 [REDACTED]

24 THE WITNESS: What had become

25 substantially public?

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 Q. The settlement agreement.

5 A. The settlement agreement as such I

6 don't think has become substantially public at

7 this point.

8 Q. You're not aware that -- that the

9 settlement agreement was filed substantially in

10 public forum as a result of this case?

11 MR. WEINSTEIN: I'm sorry, I think you

12 guys have now been talking about different

13 time periods then for some period of time, if

14 that's what you're talking about.

15 BY MR. LEVY:

16 Q. Are you aware that in connection with

17 the filing of this litigation --

18 A. Yes.

19 Q. -- the settlement agreement was -- was

20 made public to a substantial degree?

21 A. In 2023.

22 Q. Uh-huh.

23 A. Yes.

24 Q. And did Skatte ask -- did SOIK ask for

25 the settlement agreement at that point?

Page 340

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. No. At that point we, of our own

3 accord, sent it to SOIK.

4 Q. In -- in unredacted or redacted form?

5 A. In the version that was in the -- in

6 the -- in the case files over here.

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 (Additional Request for Information by

24 SOIK was marked Skatte Exhibit 123, for

25 identification.)

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2

3 BY MR. LEVY:

4 Q. Do you recognize that?

5 A. Yes.

6 Q. What's that?

7 A. That's an Additional Request For

8 Information by SOIK.

9 Q. It's a follow-up to the questions that

10 they had been asking in the prior letters that we

11 saw?

12 A. Correct.

13 Q. And it's actually numbered

14 sequentially?

15 A. Yes.

16 Q. And do you remember responding to that?

17 A. I remember responding to that, yes.

18 Q. And you were personally involved in

19 crafting the responses?

20 A. I was personally involved in the

21 process of approving the drafting.

22 Q. You edited some of the responses that

23 were drafted by others for example?

24 A. I typically do, yes.

25 Q. Okay. Do you remember doing so in this

Page 342

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 case?

3 A. If I made any specific editing in it?

4 No, I don't remember if I did.

5 Q. I'm not asking about the specific

6 edits. I'm just asking whether you remember

7 making any edits?

8 A. No, I don't remember making --

9 Q. Okay.

10 A. -- edits to it.

11 Q. You're just testifying that it would be

12 your typical process to do so?

13 A. Yes.

14

15

16

17 (Response to the Following Questions

18 was marked Skatte Exhibit 124, for

19 identification.)

20 BY MR. LEVY:

21 Q. Do you recognize that?

22 A. I do.

23 Q. What is that?

24 A. That is our response to the following

25 questions.

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 Q. To Exhibit 123?

3 A. To Exhibit 123, yes.

4

5 Let me direct your attention to

6 questions -- the answers to questions 20 through

7 22. That is -- those are questions that --

8 withdrawn.

9 Is it fair to say in general that the

10 answers to those questions concern cooperation

11 being provided by the settlement parties?

12

13

14

15

16 A. Yes.

17 Q. And -- and were you aware that around

18 this time in February of 2021 Matt and Jerome were

19 requesting that Skatte communicate to SOIK the

20 nature of the cooperation that they had provided

21 to Skatte?

22 A. If I was aware that --

23 Q. If Skatte was aware.

24 A. That?

25 Q. That Matt and Jerome were requesting

Page 344

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 that Skatte communicate to SOIK the nature of the

3 cooperation that they had provided.

4 A. What you're referring to is an email

5 sent to my counsel?

6 Q. No.

7

8 Q. I'm asking if you are aware that Matt

9 and Jerome were requesting that Skatte communicate

10 to SOIK the nature of the cooperation that they

11 had provided?

12 A. I was -- I aware that at some point

13 Stein, Lhote, and McGee, or that -- I don't know

14 if it was all three of the -- of the principals,

15 or just some of them -- I know that they at some

16 point requested us to provide information into

17 what extent we had cooperated with -- or provided

18 information to SOIK. But I don't know the exact

19 date of it on the top of my mind.

20 Q. You're -- you're -- you're aware that

21 Matt, and Jerome, and Luke had asked that Skatte

22 communicate to SOIK --

23 A. To what regard?

24

25



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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

19 Q. Was Skatte aware that around this time

20 in February of 2021 Matt and Jerome were

21 requesting that Skatte communicate to SOIK the

22 nature of the cooperation that Matt and Jerome had

23 provided to Skatte.

24 (Interpreter interprets question.)

25 THE WITNESS: (In English) No, I don't

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 think that I'm aware.



20

Age Group	Percentage of Respondents
18-29	90%
30-49	88%
50-64	85%
65+	63%

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1 GRY AHLEFELD-ENGEL 30(b)(6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 THE COURT REPORTER: "I will represent

10 to you that Matt and Jerome's counsel were

11 told by Skatte's U.S. counsel.

12 "Answer: Okay.

13 "Question: -- that Skatte was

14 uncomfortable communicating to SOIK about

15 Matt and Jerome's cooperation.

16 "Was Skatte aware of that in

17 substance?"

18 THE WITNESS: No.

19 BY MR. LEVY:

20 Q. Thank you. And was Skatte aware that

21 Skatte's U.S. counsel indicated in substance that

22 communicating with SOIK about cooperation was

23 simply something that Skatte does not do?

24 A. No.

[REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 (Request from SOIK was marked Skatte

11 Exhibit 125, for identification.)

12 (Witness reviews document.)

13 BY MR. LEVY:

14 Q. Do you recognize that?

15 A. Yes.

16 Q. What in substance was SOIK asking

17 Skatte for?

18 A. It's a -- a follow-up of the last

19 response that we were discussing. So that would

20 be our response to Exhibit 124. And they're

21 asking us, "It appears from the Danish Tax

22 Agency -- Tax Agency response to question 20 to 22

23 in our letter of January 28th that the three main

24 shareholders in North Channel Bank have assisted

25 in obtaining documents for use in the prosecution

Page 350

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 of the Danish Tax Agency's claim against the

3 individual entities that are not included in the

4 settlement.

5 "Regarding this, SOIK kindly asks

6 you -- asks you to receive the material

7 concerning" -- and then for specific names, "that

8 the Danish Tax Agency or the Danish Tax Agency's

9 counsel might be in possession of."

10 Q. Did -- did Skatte respond to this

11 request?

12 A. I don't believe that we did.

13 Q. Why not?

14 A. I don't think we were permitted to

15 disclose that information.

16 Q. Did -- did Skatte communicate that to

17 SOIK in some way?

18 A. That we were not permitted to? I don't

19 recall.

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 Q. How did Skatte determine that it was

25 not able to respond to this inquiry?

Page 351

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 A. Well, anything we did we did in the

3 process with our counsel.

4 Q. So without telling me what the advice

5 was, the reason for the non response was the

6 result of advice from counsel?

7 A. Yes, I believe so.

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]



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1 GRY AHLEFELD-ENGEL 30(b)(6)
 [REDACTED]
 [REDACTED]
 [REDACTED]
 5 (Email chain was marked Skatte Exhibit
 6 127, for identification.)
 7 BY MR. LEVY:
 8 Q. Do you recognize this?
 9 A. I recognize the document, yes.
 10 Q. Do you remember -- do you personally
 11 remember seeing it at or about the time that it
 12 was sent?
 13 A. No.
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 22 Q. Do you know who sent this email?
 23 A. Yes, Marshall Miller.
 24 Q. Yeah.
 25 A. I can see that.

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1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 Q. Do you know on whose behalf he was
 3 acting?
 4 A. I don't know the specific persons, if
 5 it's all three of them, or just -- if it's both
 6 Stein, Lhote, and McGee, or just one or two.
 7 Q. You know -- you know sitting here today
 8 that he was acting on behalf of -- of one or more
 9 of the covered parties' designees?
 10 A. Yes.
 11 Q. And -- and in substance Mr. Miller is
 12 asking for a copy of the communication that Skatte
 13 sent to SOIK in conformity with its obligations
 14 under section 8(f) of the agreement?
 15 A. Yes.
 16 Q. Was Skatte aware that counsel for one
 17 or more of the covered parties' designees was
 18 pressing Skatte to provide information about its
 19 compliance with section 8(f)?
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 24 A. I have not, as I said, seen the
 25 substance of the email before my preparation for

Page 355

1 GRY AHLEFELD-ENGEL 30(b)(6)
 2 this deposition.
 3 Q. Were you aware at the time that was
 4 occurring?
 5 A. No, I wasn't aware of the specific
 6 questions.
 7 Q. Were you aware --
 8 A. At the time.
 9 Q. Were you aware of generally that
 10 counsel for one or more of the covered parties was
 11 pressing Skatte to provide some information?
 12 A. I can tell you what I was aware of.
 13 Q. Please.
 14 A. Because at some point I was asked to
 15 verify that the answer that -- is that -- I don't
 16 know if it's here or if the answer that eventually
 17 goes from Marc to Kathleen Hegler, I was asked to
 18 verify whether or not that was a fair
 19 representation of our dialogue with SOIK.
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

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1 GRY AHLEFELD-ENGEL 30(b)(6)
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 14 (Email chain was marked Skatte Exhibit
 15 128, for identification.)
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 22 Q. And -- and what is this -- what is
 23 intended to represent?
 24 A. Again, as I said, I was asked if this
 25 was a fair representation, if the contents of the



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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 email was correct.

3 Q. Was -- was it intended to evident -- to

4 provide some evidence of Skatte's compliance with

5 section 8(f)?

6 A. I have no knowledge of what it was

7 intended. I know it was an email that was to be

8 sent.

9 Q. And you reviewed this email prior to

10 its being sent?

11 A. I was asked if the consents thereof was

12 a fair representation, if that was true, and I

13 said yes.

14 Q. It -- it refers to "good faith

15 negotiations and the obligation to provide

16 information in cooperation," correct?

17 (Witness reviews document.)

18 A. That's what it says, yes.

19 Q. And those are terms that are used in

20 section 8(f)?

21 A. Correct.

22 Q. Do you have any doubt that this was

23 sent by counsel for Skatte in order to provide

24 some evidence that 8(f) had been complied with?

25 A. Again, I don't --

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 MR. WEINSTEIN: Objection.

3 THE WITNESS: I don't -- as I said, I

4 don't know what it was -- the specific

5 questions it was in answer to. I was asked

6 to -- if this was true to my knowledge, and I

7 said yes.

8 BY MR. LEVY:

9 Q. It doesn't refer to your providing Mr.

10 Fiig's -- Fiig with the text of section 8(f) prior

11 to the signing of the settlement agreement, does

12 it?

13 A. No, it does not.

14 Q. And it doesn't refer to your providing

15 to Mr. Fiig a copy of the covered parties -- a

16 list of the covered parties prior to the execution

17 of the settlement agreement, correct?

18 A. Not specifically, no.

19 Q. And it doesn't refer to anything in

20 relation to the press release, correct?

21 A. Not specifically, no.

22 Q. This is intended to mislead Matt and

23 Jerome's counsel, is it not?

24 [REDACTED]

25 THE WITNESS: That's your opinion. Why

Page 359

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 is it -- why is it --

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 Q. I'm asking you if this was crafted with

7 the intent of misleading Matt and Jerome's

8 counsel?

9 A. No.

10 [REDACTED]

11 [REDACTED]

12 Q. Who would know the -- what the intent

13 behind this email was?

14 [REDACTED]n.

15 THE WITNESS: I don't know how to

16 answer that.

17 BY MR. LEVY:

18 Q. Well, would the writer of the -- of the

19 email know the intent?

20 [REDACTED]

21 THE WITNESS: What the intent of it

22 was? We were -- again, I was asked to

23 provide information if this was true to the

24 best of my knowledge, and I said yes.

25 The intent behind it, I have -- I have

Page 360

1 GRY AHLEFELD-ENGEL 30(b)(6)

2 no way to testify towards that.

3 BY MR. LEVY:

4 Q. Only the author of the -- the email

5 would know, correct?

6 [REDACTED].

7 THE WITNESS: I don't know how to

8 answer that question. I can't testify to it.

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 (Affidavit of Confession of Judgment

23 was marked Skatte Exhibit 129, for

24 identification.)

25 BY MR. LEVY:



A horizontal bar chart titled 'U.S. should take action to address climate change'. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'All adults'. The x-axis represents the percentage of respondents, ranging from 0 to 100 in increments of 10. For each age group, there are two bars: a blue bar for 'Total' and a red bar for 'Men'. The data is as follows:

Age Group	Total (%)	Men (%)
18-29	93	93
30-49	83	83
50-69	73	73
70+	88	88
All adults	81	81

Age Group	Percentage of Respondents
18-29	90%
30-49	88%
50-64	78%
65+	63%

[illegible]

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change, broken down by age group. The x-axis represents the percentage from 0 to 100. The y-axis lists age groups from youngest to oldest. The bars are dark blue. The data is as follows:

Age Group	Percentage
Youngest	92%
18-29	89%
30-49	88%
50-64	87%
65+	78%
Youngest	68%
18-29	78%
30-49	83%
50-64	88%
65+	77%
Youngest	85%
18-29	88%
30-49	90%
50-64	91%
65+	89%
Youngest	73%
18-29	80%
30-49	85%
50-64	88%
65+	85%
Youngest	82%
18-29	85%
30-49	88%
50-64	90%
65+	88%
Youngest	75%
18-29	80%
30-49	85%
50-64	88%
65+	85%
Youngest	88%
18-29	90%
30-49	92%
50-64	93%
65+	91%

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5



<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>

Service	Percentage
Online banking	95%
Mobile banking	92%
ATM	88%
Branch	85%
Mobile app	78%
Other	72%

Age Group	Percentage of Respondents
18-29	90%
30-49	85%
50-64	80%
65+	65%

[illegible]

Age Group	Percentage of Respondents
18-29	95%
30-49	92%
50-64	90%
65+	65%

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>



ESQUIRE
DEPOSITION SOLUTIONS

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>Page 416</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>[REDACTED]</p> <p>25 Okay, so with regard to 106, this is</p>



Page 417

1 GRY AHLEFELD-ENGEL 30(b)(6)
2 the press release you were referring to.
3 Is that fair?
4 A. That is the final press release that
5 executed, correct.
6 Q. Okay. And that's the one you were
7 referring to in response to Mr. Levy's question
8 when you talked about compliance, as it relates to
9 the press release?
10 A. Yes, and every -- every other -- the
11 press release went back and forth in early -- so
12 this is -- what I'm saying is this is the final
13 executed one, which might be different from the
14 attachment that went back and forth in the email,
15 because they were continuously being revised.
16 Q. Understood. But this is the final
17 press release you're referring to?
18 A. That is the final press release.
19 Q. And with regard to -- at -- at no time
20 prior to the filing of the lawsuits by Mr. Stein
21 and Mr. Lhote did Skatte ever contend -- am I
22 correct -- did Skatte ever claim that the
23 defendant -- or the parties, defendant parties in
24 this lawsuit that Skatte is suing ever failed to
25 cooperate.

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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 Is that correct?
3 Skatte never claimed that they didn't
4 cooperate with Skatte. Is that correct?
5 MR. WEINSTEIN: Objection.
6 THE WITNESS: We didn't claim prior to
7 the lawsuit that they didn't cooperate?
8 BY MR. NEWMAN:
9 Q. Yeah, correct.
10 A. Not to my knowledge.



ESQUIRE
DEPOSITION SOLUTIONS



ESQUIRE
DEPOSITION SOLUTIONS

[REDACTED]

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- 1 GRY AHLEFELD-ENGEL 30(b)(6)
2 Q. Do you recognize Exhibit 137?
3 A. I do.
4 Q. What do you recognize this as?
5 A. A letter from Skatte to SOIK.
6 Q. Okay, were you involved in the creation
7 of this letter?
8 A. I was -- yes, I was involved in the
9 sending of this letter.

[REDACTED]

[REDACTED]

1 GRY AHLEFELD-ENGEL 30(b)(6)
2 A F T E R N O O N S E S S I O N
3 (Whereupon at 1:42 p.m. the videotaped
4 30(b)(6) deposition of Skatteforvaltningen by Gry
5 Ahlefeld-Engel resumed, and she further testified
6 as follows.)

7 THE LEGAL VIDEO SPECIALIST: We're on
8 the record at 1:42 p.m.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



ESQUIRE
DEPOSITION SOLUTIONS



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1 GRY AHLEFELD-ENGEL 30(b)(6)

22 Q. Can I ask you to look at 141.

23 A. Yes.

Page 456

1 GRY AHLEFELD-ENGEL 30(b)(6)

4 Q. This is the email from Ms. Spang at
5 Skatte back to SOIK that's part of the string of
6 emails concerning the provision of the settlement
7 agreement, correct?

8 A. Correct.

9 Q. And without telling me the content of
10 the discussions, did Skatte receive legal advice
11 in connection with formulating its -- its response
12 back to SOIK that's set out in Exhibit 141?

13 A. I don't remember specifically if we had
14 advice, but as a general process that is always
15 followed within my system, whenever we release any
16 information about anything concerning the case, we
17 seek advice from counsel.

18 Q. So it -- so it's fair to surmise that
19 Skatte would receive legal advice about the
20 content of Exhibit 141?

22 THE WITNESS: It's fair to assume that
23 we would have conferred with our legal
24 advisors regarding the contents of
25 information we provide.

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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 concludes the 30(b)(6) deposition of Skatte.
3 THE LEGAL VIDEO SPECIALIST: Okay,
4 thank you. The time is 2:08 p.m. We are now
5 off the record.
6 (Whereupon at 2:08 p.m. the videotaped
7 30(b)(6) deposition of Skatteforvaltningen by
8 Gry Ahlefeld-Engel concluded.)
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GRY AHLEFELD-ENGEL Vol. 2 30(b)(6)
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1 GRY AHLEFELD-ENGEL 30 (b) (6)
2 C E R T I F I C A T E
3 STATE OF NEW YORK)
4 : Ss.
5 COUNTY OF NEW YORK)
6 I, Kim M. Brantley, Shorthand
7 Reporter, and Notary Public within and for the
8 State of New York, do hereby certify:
9 That GRY AHLEFELD-ENGEL, the witness
10 whose deposition is hereinbefore set forth, was
11 duly sworn by me and that such deposition is a
12 true record of the testimony given by the witness.
13 I further certify that I am not related
14 to any of the parties to this action by blood or
15 marriage, and that I am in no way interested in
16 the outcome of this matter.
17 IN WITNESS WHEREOF, I have hereunto set
18 my hand this 2nd day of June, 2024.
19 
20 _____
21 Kim M. Brantley
22
23
24 My Commission expires May 31, 2026.
25